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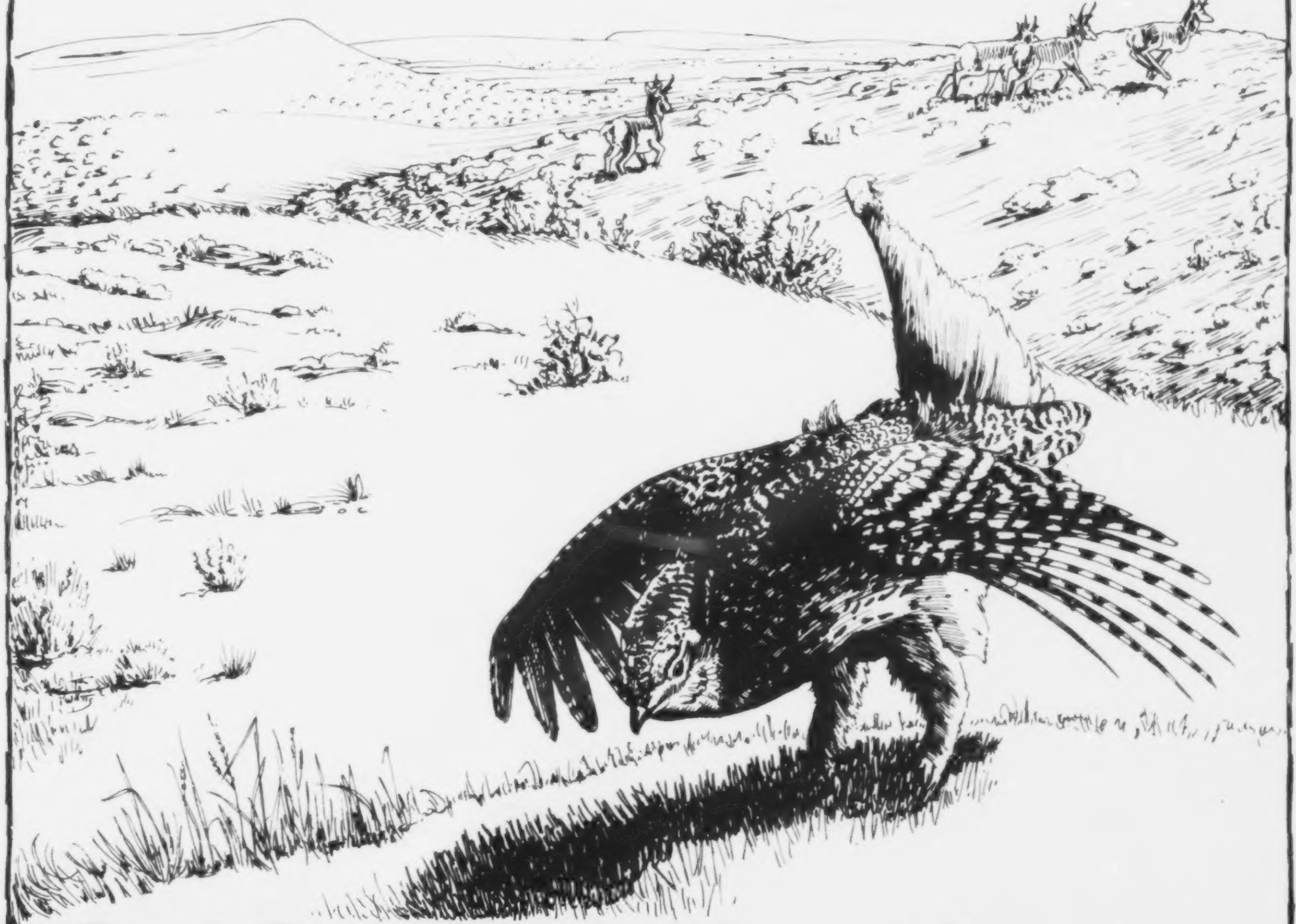
CHARLES M. RUSSELL

National Wildlife Refuge
Montana



Final Environmental Impact Statement

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C.M.R. Final Environmental Impact Statement

United States Department of the Interior

U.S. Fish and Wildlife Service

Final Environmental Impact Statement for the
MANAGEMENT OF CHARLES M. RUSSELL NATIONAL WILDLIFE REFUGE

August 1985

Galen L. Buterbaugh
Regional Director, Region 6

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FINAL ENVIRONMENTAL IMPACT STATEMENT

MANAGEMENT OF CHARLES M. RUSSELL NATIONAL WILDLIFE REFUGE

Department of the Interior
U.S. Fish and Wildlife Service
Regional Office, Denver, Colorado

August 1985

FOREWORD

Management of CMR has historically been hampered by a lack of comprehensive planning and conflicting jurisdiction by three Federal agencies: Army Corps of Engineers (COE), Bureau of Land Management (BLM), and Fish and Wildlife Service (FWS).

Passage of Public Law 94-223, February 27, 1976 resolved the jurisdictional problems with BLM. A Memorandum of Agreement in 1979 between COE and FWS solved most problems between these agencies.

Public Law 94-223, also specifically directed that CMR would be managed under the National Wildlife Refuge System Administration Act of 1966. The October 1983 decision of the Appellate Court reaffirmed this law.

On September 20, 1979, the Fish and Wildlife Service issued a Notice of Intent to prepare an Environmental Impact Statement (EIS) on the management of CMR.

The Service's scoping process provided opportunity for public input on the development of an EIS. Various groups and individuals from a wide variety of backgrounds and interests, including Refuge permittees, provided management recommendations. Public meetings were advertised by news media and phone calls. Letters were sent to individuals, Federal, State, and local government representatives, and other interested parties. Meetings were held by FWS in Lewistown, Helena, Billings, and Glasgow, Montana, in April 1978, and in Lewistown, Helena, Billings, Glasgow, Missoula, Jordan, Great Falls, and Glendive in September 1979. The COE also held meetings at Glasgow, Lewistown, Glendive, and Jordan in June 1979. These efforts resulted in identification of specific resource problems and possible solutions.

During August 1980, a Draft EIS (DEIS) was printed and distributed to interested parties for comment. Public meetings regarding the DEIS were held in Washington, D.C. and Lewistown, Glasgow, and Missoula, Montana, during late 1980. Public comments were solicited and received.

Publication of the Final EIS (FEIS) was delayed due to court action (Schwenke, et al, vs. Secretary of the Interior, et al). On January 14, 1982, U.S. District Court in Billings, Montana ruled:

> "....We have decided that the ranchers are entitled to have grazing declared a co-equal priority with wildlife conservation...."
>
> "....thus we must conclude that CMR must still be administered under the Taylor Grazing act."

The District Court's decision was appealed to the United States Ninth Circuit Court of Appeals. On October 14, 1983, the Appellate Court overturned the District Court and ruled that:

> "(1) Wildlife has priority in access to the forage resources of the range up to the limits specified in Executive Order 7509;
>
> (2) Beyond those limits, wildlife and livestock have equal priority in access to the resources of the Range; and
>
> (3) The Range is to be administered under the Wildlife Refuge Act."

("Range" refers to CMR. The "Wildlife Refuge Act" refers to the National Wildlife Refuge System Administration Act of 1966.)

The ruling of the Appellate Court reaffirmed the criteria followed in preparing the original DEIS. However, due to a delay of over 3 years, the Service decided to cancel the earlier DEIS and an updated DEIS was prepared and released on February 24, 1984.

Comments on the second DEIS were accepted until August 15, 1984. In addition, a second round of public hearings was held in late July and early August of 1984 in Glasgow, Lewistown, and Missoula, Montana. Comments with responses of both the first and second DEIS's, and transcripts and responses to the public hearings on the second DEIS, are included as part of this FEIS.

This FEIS, while assessing various options proposed to resolve some of the Refuge's resource conflicts, is not a comprehensive management plan.

Because habitat is recognized as the key to wildlife abundance, this document emphasizes habitat quality and quantity rather than wildlife populations or densities. Where possible, the habitat's capability to support numbers of animals per unit area has been used. Establishment of high quality wildlife habitat will provide desired populations of wildlife species within constraints imposed by weather, disease, and other variables which are largely uncontrollable.

Range condition and wildlife habitat are not the same and should not be used synonymously. Differentiation is critical to an understanding of this document. Range condition measures such parameters as plant species composition. It does not address important wildlife habitat components such as residual cover, vegetative interspersion, and diversity, nor does it attach sufficient importance to key wildlife shrub communities.

This EIS follows the Council on Environmental Quality's regulations for implementing The National Environmental Policy Act, as amended July 30, 1979. Appendices, a glossary, an index, and public comment and testimony with FWS responses are included. A large, fold-out map is provided inside the back cover for easy reference.

After public review of this FEIS, a Record of Decision (ROD) will be issued. This ROD will state which alternative has been selected for implementation.

Once the Record of Decision is released, specific Habitat (allotment) Management Plans to meet the goals and objectives, as outlined in this FEIS, or as modified by the Record of Decision, will be developed.

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SUMMARY

This Final Environmental Impact Statement (FEIS) is prepared in specific response to litigation files in U.S. District Court for the District of Columbia, entitled Natural Resources Defense Council, Inc, et.al. versus Rogers C. B. Morton, et. al. (June 1975). The EIS presents five management alternatives to solve some of the resource problems on Charles M. Russell National Wildlife Refuge (CMR), located in northeastern Montana.

The boundaries of the Charles M. Russell National Wildlife Refuge (CMR) enclose nearly 1.1 million acres. Included are state and private lands, as well as over one half million acres of U.S. Corps of Engineer (COE) lands, of which approximately one quarter million comprise Fort Peck Reservoir. Part of the Missouri River which flows through the refuge is administered by the Bureau of Land Management (BLM) as the nationally designated Upper Missouri National Wild and Scenic River. Besides the grazing activity authorized by the Executive Order establishing CMR, three state parks managed by the Montana Department of Fish, Wildlife and Parks (MDFWP) and several recreation areas administered by the Army Corps of Engineers are located on the refuge, making this an atypical refuge compared to other units of the National Wildlife Refuge System.

Although varying quantities of oil, gas, and coal are known to occur beneath the rugged landscape, these and other energy resources have low to moderate potential for development. However, development of these resources outside the refuge and in the surrounding region could increase significantly in the future and would have far-reaching impacts on the refuge because of increases in recreation and other pressures resulting from population increases. Soils of the refuge fall into four major orders: Mollisols, which are highly productive prairie soils and are quite limited; Aridisols, which possess potential for agricultural use; Entisols, which typically are found in the "breaks" portion of the refuge and have a very unstable surface; and Vertisols, which are commonly associated with fine textured Bearpaw shales found on strongly sloping sedimentary uplands. Soils and weathered bedrock on the refuge are moderately to highly expansive, tending to swell when wetted and heave when excavated, which limits the types of development they can support.

Five major vegetative types exist on the refuge, the largest being the sagebrush-greasewood-grassland type that comprises more than 60 percent of the upland area. About 35 percent of the area is associated with the ponderosa pine-juniper type.

Grassland, riparian, and cultivated land types occupy the balance of the area. Although the riparian community was extensive before being inundated by Fort Peck Reservoir, it now occupies only 0.7 percent of the area. It provides one of the most important and productive wildlife habitat types.

Warm summers and cold winters create a harsh environment. From the uplands to the flood plains, the great variation in topography and vegetation creates a diversity of wildlife habitat. Plains grizzly bears, American bison, Audubon bighorn sheep, and wolves once roamed the refuge, but are no longer present. Even before their time, the area supported a rich assemblage of plant and animal life, as evidenced by significant paleontological discoveries in the Hell Creek and Fort Union formations.

Today the primary species of economic importance are mule deer, white-tailed deer, pronghorns, Rocky Mountain elk, sharp-tailed and sage grouse, coyotes, and black-tailed prairie dogs. No threatened species are known to occur on the refuge. Endangered species include peregrine falcons, bald eagles, and possibly black-footed ferrets.

Wildlife habitat on the refuge is only in fair condition. Present deficiencies in habitat include lack of residual cover (grasses and forbs) on upland sites, around ponds, and in hardwood draws; poor quality and small quantity of deciduous shrubs and trees in hardwood draws and along minor stream courses; poor quality sagebrush stands; and insufficient timber density in some areas. There is potential to improve most of the habitat on CMR.

In terms of climax range vegetation, the refuge is predominantly in good condition. Where deteriorated conditions are present, over allocation of forage to livestock is the most common problem, causing about seven percent of the grazed portions of the refuge to be in fair condition. Portions of the refuge in poor range condition are generally associated with prairie dog towns or flood plains.

The refuge has relatively few developed recreation areas for its size. Most of these are COE areas located near Fort Peck Townsite and the Big Dry Arm segment of the reservoir. Private cabins are located on federal land at four locations. Including visitation at COE and state facilities, an estimated 357,000 visitor days of use occurred on the refuge in 1978. The most popular activities were viewing scenery and exhibits, picnicking, hunting, fishing, powerboating, and camping. Most of this use occurred near developed recreation areas on the east side of the refuge.

Numerous prehistoric campsites, tipi rings, stone markers, bison kill sites, homesteads, pioneer graves, and townsites are scattered throughout the area. There is one designated national historic site, two national natural landmarks, four research natural areas, one designated wilderness area, 15 proposed wilderness areas, and the Upper Missouri National Wild and Scenic River.

Grazing and haying activities on the refuge contribute slightly to the regional economy. Expenditures by recreationists generate additional income, as does hydropower production from Fort Peck Dam and Reservoir. The area around the refuge has been characterized by economic growth slightly above the national average with an economy based on the production of grain and livestock.

In 1979 there were 67 grazing allotments located partially or totally on the refuge, consisting of 89 individuals, companies, or associations grazing about 60,000 animal-unit months (AUMs). Nine allotments are under grazing systems, such as rest-rotation and deferred grazing. Based on a grazing fee of $1.89/AUM, this activity contributes nearly $107,000 to the U.S. Treasury. Since 1979, pending the issuance of an EIS, the refuge has essentially been managed on a status quo basis. One exception is that grazing fees have increased. In 1984, grazing fees were $4.61/AUM, thus contributing about $277,000 to the U.S. Treasury.

Approximately 800 acres of land were farmed in 1979 on the refuge by eight cooperators. Income derived from this source was estimated to be less than $10,000.

Appendix 1b. delineates the planning process for CMR.

Five alternatives are considered in this document. Tables 1 and 3 summarize their environmental and economic impacts. All alternatives include monitoring of habitat, wildlife and range. These alternatives are:

NO ACTION ALTERNATIVE

Management would continue unchanged. Animal damage control would occur to solve specific problems. Livestock numbers would not change. Major management actions would include surveys, issuing grazing licenses, some cooperative farming, and wildfire control. There would be no significant improvement in range conditions or wildlife habitat. Any changes in the status of recreational development would be accomplished in accordance with the Memorandum of Agreement with COE of July 1979 and in accordance with FWS policies and objectives.

PROPOSED ACTION ALTERNATIVE

Peregrine falcons, black-footed ferrets, bighorn sheep, and swift fox would be reintroduced as they become available. Wildlife habitat conditions would be substantially enhanced by 2005 with most grazing reductions and other major actions implemented by 1990 and the remainder by 2005. Wildlife habitat management objectives would be met or exceeded refuge-wide by 2005. Significant management actions would include adoption of grazing schemes that would result in reduction in livestock grazing as well as changing existing livestock seasons of use and modifying existing grazing systems to benefit wildlife. Some shrub planting and construction of exclosures would occur. Most wildfires would be suppressed and some prescribed burning would occur on the west half of the refuge and in Garfield County. Some boundary fences and a few interior fences would be constructed. A few new reservoirs, water pipelines, and several troughs would be built. Wildlife habitat would be evaluated periodically to ensure that objectives were being met; necessary corrections in management would be made. Farming along the Missouri River would be phased out but some lure crop farming would be tried to decrease elk depredation on private lands. Animal damage control would be similar to the No Action alternative.

Federal livestock AUMs would eventually be reduced an average of 33 percent below levels presently authorized to achieve a light grazing level determined to be consistent with wildlife objectives. Some inholdings would be acquired on a willing seller basis.

There would be more opportunities for wildlife recreation due to improvement of habitat and expected increases in wildlife populations. Present high and low density recreation areas would be retained and expanded as needs dictate. A new boat access site would be established at Fourchette Bay. Private cabin sites would not be affected. Interpretive programs would be emphasized and access to recreational areas and facilities would be improved. COE recreation areas would be developed by that agency.

INTENSIVE WILDLIFE MANAGEMENT ALTERNATIVE

Special arrangements with the State Land Board (SLB) and COE changes in policy for CMR would have to occur to fully implement this alternative. A substantial budget increase would be necessary.

Endangered and unique species introductions would be as stated in the Proposed Action alternative. About 2,000 acres would be farmed in plots of varying sizes to increase wildlife food supplies and habitat diversity. Waterfowl ponds would be developed at UL Bend. Bison would be introduced on the UL Bend area. Spawning habitat for fish would be developed on the reservoir. Wildlife habitats would be enhanced to full potential for most species in a minimum time span. Most actions to achieve desired habitat levels would be implemented by 1990 and the remainder by the year 2005; however, the time required for maturation of certain vegetative communities would take 50 or more years. Burning, farming, soil ripping, shrub and conifer planting and exclosure fencing would be considerably more extensive than the Proposed Action. Periodic habitat evaluation would occur. Most wildfires on CMR would be suppressed as stated in the Proposed Action, but prescribed burning would occur in Garfield County and on the west half of the refuge. Many inholdings would be acquired on a willing seller basis. Predator control to protect livestock and prairie dog control would be the same as the No Action alternative. Coyote and small mammal control to benefit other wildlife species would be minimal. The naturalness management concept would be abandoned in favor of developments which would provide additional benefits to wildlife.

Livestock grazing would be employed as a tool to achieve or maintain desired wildlife habitat. Livestock AUMs would be reduced by about a half to approximately 27,000-30,000 Federal AUMs as a result of this alternative.

Range improvements would be limited to fencing approximately two-thirds of the refuge boundary to regulate livestock.

Recreation would be oriented toward wildlife activities. Private cabins would be eliminated over time, and the areas returned to wildlife habitat. More primitive fishing access sites would be provided and replace some existing high and low density recreation areas. Nature trails would be established at several locations.

MULTIPLE USE ALTERNATIVE

This alternative would require Congressional action to implement. It would emphasize all resources instead of giving priority to wildlife. Wildlife values would be equal to livestock, as would recreation. This alternative would provide only slight improvements in habitat quality. About 41,000 acres would be improved for wildlife habitat by prescribed burning, soil ripping, shrub planting, and farming. Ten miles of exclosure fence would be constructed. Most wildfires would be controlled as soon as possible.

Animal damage control for livestock losses would be conducted under the same regulations as adjacent land. Animal damage control for wildlife other than coyotes would be minimal. Waterfowl production areas would be expanded at UL Bend. Endangered and unique species introductions would be more limited than the Proposed Action alternative.

Livestock would receive approximately half the allocated forage by the year 2005. There would be some boundary and interior fence construction. Seventy-seven reservoirs, two springs, and 13 water troughs would be constructed, and deferred or rest-rotation grazing systems would be implemented on 12 allotments.

Recreational use and development would be greater than with the other alternatives. As needs dictate, high and low density recreation areas would be expanded, a perimeter shoreline scenic road in the vicinity of Fort Peck would be constructed, and a major backcountry trail extending the length of the refuge would be designated. Private cabins would remain as they are.

NO GRAZING ALTERNATIVE

Changes in SLB policy would have to occur before state inholdings could be acquired. All private and state inholdings would have to be acquired before elimination of livestock grazing could occur since most of these areas are unfenced and stocked by the operators at carrying capacity levels. Habitat improvements in residual cover and quantity of forbs would be maximized. Increased shrub quality in hardwood draws would be significant. About 28,500 acres of habitat would be improved by farming, prescribed burning, soil ripping, and shrub and conifer planting. Six miles of exclosure fence would be constructed. Wildfire control would be similar to the Proposed Action.

Animal damage control for wildlife and livestock would be the same as the No Action alternative. Endangered and unique species introductions would be similar to the Proposed Action alternative.

All livestock grazing on Federal lands would be eliminated by the year 2005. The entire refuge boundary would be fenced if possible.

Recreational development and use would be about the same as the Proposed Action alternative.

I. PURPOSE AND NEED FOR ACTION

I. PURPOSE AND NEED FOR ACTION

Many wildlife-livestock problems at the Charles M. Russell National Wildlife Refuge (CMR) have resulted from conflicting management and legislation during 40 years of joint administration by the Fish and Wildlife Service (FWS), Bureau of Land Management (BLM), and Corps of Engineers (COE). These agencies embrace differing management responsibilities, goals, and philosophies. Because of numerous federal laws applicable to CMR, ultimate management authority was unclear. In addition, numerous private and state inholdings complicate management.

When the Fort Peck Game Range (now CMR) was established in 1936, BLM was assigned livestock management, and all forage above the needs of wildlife was to be available for livestock grazing. FWS was assigned wildlife management responsibility simultaneously with BLM's responsibility for livestock grazing. Resulting multiple use management did not realize the wildlife intent for CMR. In 1976, Congress transferred grazing responsibilities to FWS to better realize wildlife potentials. The change shifted grazing management from the Taylor Grazing Act to the Refuge Administration Act.

FWS changes in grazing practices have resulted in distrust and uncertainty of CMR goals by the livestock industry and federal and state agencies. Misunderstanding arises from refuge management, with its dominant purpose for wildlife, as opposed to adjacent BLM lands, where multiple use gives equal consideration to livestock grazing and other uses.

Recent challenges at CMR are management of archaeological and historical sites, reintroduction of endangered or threatened species, a growing regional and national sentiment by environmental groups for reduction or elimination of livestock grazing versus a local sentiment for favoring grazing, conflicts regarding consumptive versus nonconsumptive use of wildlife, fencing of the boundary, management of CMR as an isolated wildlife oasis versus management as part of a total ecosystem, local recreation demands that may not be compatible with CMR goals, and integration of wildlife, recreation, and other natural values.

FWS believes that the key to meeting its management objectives on CMR is to evaluate the current status of the resource and devise a master plan, taking into consideration all interests. The planning process is explained in Appendix 1b. This process has included resource inventories, opportunities for resource development, conflict analyses, and a scoping process whereby the public has opportunities to identify significant issues.

The scoping process involved people with diverse backgrounds and interests in many natural resource areas from across the nation. Some toured CMR, providing management recommendations. Public meetings were advertised by news media and phone calls. Letters were sent to individuals, special interest groups, and Federal, State, and local government representatives. Meetings were held by FWS in Lewistown, Helena, Billings, and Glasgow in April 1978, and in Lewistown, Helena, Billings, Glasgow, Missoula, Jordan, Great Falls, and Glendive in September 1979. COE also held meetings at Glasgow, Lewistown, Glendive, and Jordan in June 1979. These efforts resulted in identification of specific resource problems and possible solutions, which are developed in the alternatives presented in this document.

This Final Environmental Impact Statement (FEIS) was prepared in compliance with the National Environmental Policy Act of 1969, and in specific response to litigation filed in U.S. District Court, for the District of Columbia, entitled, National Resources Defense Council (NRDC), Inc. et al. versus Rogers C.B. Morton et al. (June 1975), which required the Department of Interior to write EIS's for grazing management on 212 units of federal rangelands in the West, including CMR. The primary responsibility for writing these statements was given to BLM. However, on 17 February 1976, amendments to the National Wildlife Refuge System Administration Act (Public Law 94-223) were passed, giving BLM's jurisdiction of the refuge to FWS, along with the responsibility for writing this statement. As a result of negotiation with NRDC, it was agreed that the EIS for CMR would cover the entire management of the refuge, of which grazing is a major part.

II. ALTERNATIVES

II. ALTERNATIVES

This chapter defines and evaluates five management alternatives for CMR and concludes with a comparison. Management alternatives for wilderness have been deferred until a later date; plans for managing 15 proposed wilderness areas comprising approximately 161,000 acres on CMR will be developed after Congressional action on these areas is taken. These plans will take into account such items as access, fire control, mining, visitor carrying capacity, and wildlife habitat requirements. None of the alternatives deals with wilderness values of existing or proposed areas. Refuge System policy is that mineral extraction will only be authorized when there is an outstanding mineral claim. No new claims will be honored. Thus, FWS saw no need to address minerals in detail in the alternatives. Management actions for all alternatives must take into account special Legislative and Executive mandates for cultural resources and endangered or threatened species. Before any action is taken which may impact cultural resources, individual site surveys will be completed for each area; these requirements will be met under all alternatives as required by law.

Under Section 7 of the Endangered Species Act, a biological opinion is required on effects of each alternative on endangered or threatened species present or thought to be present on the refuge. The biological opinions have been made (Appendix 1a). In addition, an assessment of impacts will be made of any area from which black-footed ferrets would be captured for transplanting to the refuge. Black-footed ferrets are not expected to be available in the near future.

Recreation proposals in all alternatives are a combination of proposals by FWS, COE and Montana Department of Fish, Wildlife and Parks (MDFWP). A detailed description of each is available for inspection at the FWS office in Lewistown, Montana. All developments would be constructed with facilities for handicapped users as required by the Architectural Barriers Act of 1968, P.L. 90-480.

Proposed recreation facilities and services for all alternatives are based on projected needs and users of CMR for 2005. These facilities and services would be provided for each alternative as demands dictate and as funds and manpower are made available.

For analysis of wildlife habitat on CMR, 17 indicator wildlife species in five major vegetative types (Fish and Wildlife Service 1979) were studied. Included were seven game species, seven nongame species, and three furbearers (Appendix 2).

Once again, it should be understood that habitat conditions that benefit each of these and other wildlife species on the refuge are not necessarily the same, and are not necessarily met by good range condition. Generally, habitat deficiencies for many species can be corrected by fulfilling requirements of sharp-tailed grouse, mule deer, and pronghorns. For example, sampling data revealed that improving the habitat for sharp-tailed grouse alone will improve habitat for approximately 80 percent of all wildlife species using the same habitat. Thus, sharp-tailed grouse, mule deer, and pronghorns are referred to consistently throughout the document.

The majority of private and State inholdings are unfenced and in common with other land in the allotments administered by FWS, COE, or BLM. Livestock stocking rates on these inholdings are determined by the landowner or operator as long as they are consistent with recognized livestock carrying capacities determined by a valid range survey and the season of use is the same as the rest of the allotment. If the owner or operator wishes to deviate from the grazing pattern of the allotment, the land must be fenced or other measures taken to ensure the operations do not affect the majority landowner.

Throughout discussion of the alternatives the years 1990 and 2005 are used as standard points of reference for purposes of data analysis and comparison. These dates are not necessarily precise in all cases and should not be interpreted that way. Rather, they represent results and situations that will generally be expected by these dates. All alternatives provide for monitoring of the results of management actions to determine whether objectives are being achieved.

A mission statement and long range goals for CMR were approved by the FWS Regional Director in September 1978. Refuge mission and goals were developed in accordance with existing laws, executive orders, and policies that guide the National Wildlife Refuge System.

CMR Mission:

The mission of CMR is to preserve, restore, and manage in a generally natural setting a portion of the nationally significant Missouri River breaks and associated ecosystems for optimum wildlife resources and provide compatible human benefits associated with its wildlife and wildlands.

CMR Goals in Priority Order:

1) Attain and perpetuate a balanced, natural diversity of plant and animal communities favoring endangered or threatened species, then all other native species, and finally desirable exotics.

2) Provide the habitat and necessary resources for recovery or reintroduction of species endangered or threatened with extinction, as recommended by approved recovery plans.

3) Protect and maintain Congressionally established wilderness areas and state and nationally designated historic, cultural, and natural areas and objects unique to the Missouri River breaks.

4) Restore and maintain habitat and other conditions necessary to sustain optimum populations of mammals and nonmigratory birds.

5) Manage migratory bird habitats first for production and then for use during migration.

6) Preserve and protect the integrity of the nationally significant Missouri River breaks ecosystem.

7) Protect and maintain the natural resources of the Missouri River upstream from the Fred Robinson Bridge to complement and enhance the nationally designated Upper Missouri National Wild and Scenic River.

8) Provide grazing for domestic livestock when compatible with wildlife and habitat goals.

9) Provide public understanding and appreciation of the fish and wildlife, recreational, cultural, and scenic resources on CMR through high quality programs in environmental education, interpretation, wildlife observation, hunting, fishing, and other forms of wildlife-oriented recreation when compatible with wildlife goals.

10) Demonstrate and contrast management of wildlife through natural ecological processes, areas managed for maximum wildlife abundance and diversity, and areas managed especially for compatible public uses of wildlife and wildlands.

11) Coordinate and integrate, where feasible, management of CMR with objectives of federal and state agencies and private landowners within and around CMR. All alternatives must also address the wildlife, range and recreation objectives approved for CMR that evolved from its mission and goals. These are:

Wildlife Objectives in Priority Order:

1) Reintroduce peregrine falcons and maintain two eyries by 1990, and a third by the year 2005).

2) Maintain habitat for and reintroduce a minimum of six pairs of black-footed ferrets on six or more prairie dog towns when animals are available.

3) Maintain existing migration habitat for bald eagles and determine feasibility of establishing a breeding population.

4) Improve and maintain sharp-tailed grouse habitat and habitat for associated species in good to excellent condition in the ponderosa pine-juniper, juniper, and grass-deciduous shrub types to support (on suitable areas) 30 spring breeding birds/sq. mile (males and females) by the year 2005 when weather, predation life cycles, or other natural factors permit.

5) Improve and maintain pronghorn winter habitat in good to excellent condition on suitable sites in the juniper and sage-grassland types to support 1,500 wintering animals by the year 2005.

6) Improve and maintain riparian habitat on the Missouri and Musselshell rivers and other suitable riparian areas in good to excellent condition by the year 2005 to benefit wildlife species such as white-tailed deer, raccoons, beaver, waterfowl, kingbirds, mourning doves, elk, American kestrels, ring-necked pheasants, and turkeys.

7) Improve and maintain mule deer habitat on the refuge in sage-grassland, ponderosa pine-juniper, and grassland-deciduous shrub vegetative types in good to excellent condition to support over-wintering populations of 10 deer/sq. mile by the year 2005, in a manner that will also benefit sharp-tailed grouse.

8) Maintain viable prairie dog towns totalling no less than 5,000 acres and no more than 10,000 acres on suitable areas with sizes and patterns desirable for black-footed ferrets. Minimize conflicts with adjacent landowners.

9) Maintain elk habitat in good to excellent condition and improve security cover to a level capable of maintaining a population of 2.5 over-wintering elk/sq. mile in the coniferous and closely associated grassland communities by the year 2005. Minimize crop depredation on private lands.

10) Improve waterfowl habitat to good or excellent condition on all suitable ponds.

11) Reintroduce Rocky Mountain bighorn sheep and swift fox into suitable habitat.

Range Objectives:

1) Improve range condition and enhance productivity and stability of soil resources to complement wildlife objectives.

2) Provide forage beyond the needs of wildlife to domestic livestock where environmental limitations do not preclude such use.

3) Provide stability and support to livestock users and their operations consistent with wildlife objectives.

Recreation Objectives:

1) Identify, preserve, and protect all cultural resource values in accordance with public law.

2) Continue to provide opportunities for the public to enjoy sport hunting, fishing, and other wildlife/wildlands-oriented recreation, including interpretation and environmental education, compatible with wildlife objectives and the overall refuge mission.

3) Continue other agency management of developed recreation areas for nonwildlife-oriented recreation, compatible with wildlife objectives.

ALTERNATIVE A

(No Action)

GENERAL

Under this alternative the wildlife objectives for CMR would not be met.

ENDANGERED OR UNIQUE SPECIES

Endangered or unique species management would comply with existing federal laws and regulations. Ongoing management actions consist of bald eagle surveys, black-footed ferret sign searches, preparation for possible peregrine falcon reintroduction, and law enforcement.

HABITAT MANAGEMENT

Wildlife surveys on CMR would consist primarily of aerial and ground surveys to determine pronghorn, deer, and elk distribution, deer and elk population levels, sage and sharp-tailed grouse display ground locations and population levels, waterfowl production, colonial nesting bird production, beaver population trends, coyote densities, and prairie falcon and golden eagle use.

Nest structures for geese and waterfowl brood ponds would be maintained near the old Slippery Ann headquarters. A few scattered water developments would be constructed and maintained for wildlife and livestock, and suitable ponds stocked with fish.

The existing small cooperative farming program on the Missouri River bottomlands in the west unit would be continued. Farming would be conducted on a sharecrop basis with one third left for wildlife needs. Habitat conditions would be monitored by vegetative sampling.

All wildfires would be suppressed as soon as possible following discovery. Those that could be reached by vehicle would be fought with hand crews. Aerial retardant would be used if ground crews were ineffective. An exception to this policy would pertain to the portions of CMR in Petroleum, Fergus, and Phillips Counties where fires would be monitored but permitted to burn as long as the fire is confined to the drainage and continues to meet rigid climate constraints. No prescribed burning would be used in this alternative.

Fisheries management would consist of cooperating with the MDFWP in stocking fish and enforcing regulations.

FWS would control predators to reduce livestock depredations on a case-by-case basis upon request of the livestock operator and confirmation of damage. No prairie dog control would normally occur on the refuge except for human health and safety purposes. Prairie dog control would be considered where refuge lands adjoin other landowners as a last resort when they are causing problems to the landowner. No coyote control would occur to protect other wildlife. Weeds would be controlled in accordance with state and county requirements.

FORAGE ALLOCATION

Livestock grazing would remain at current levels. Total federal livestock Animal-Unit Months (AUMs) would be maintained at 60,108 with 3,524 in a nonuse status. Vegetation for wildlife used for food, residual cover, or other habitat needs would total about 50,000 AUMs. There would be a slight increase in total forage available for wildlife and livestock on a refuge-wide basis, totalling approximately 110,000 AUMs, by 1985.

RANGE DEVELOPMENTS

Range improvements would continue at present levels with limited maintenance or new construction scheduled.

RECREATION AND CULTURAL RESOURCES

There would be minor improvements in existing recreation facilities. The 21-mile reach of the Missouri River downstream from the Upper Missouri National Wild and Scenic River, between Fred Robinson Bridge and headwaters of Fort Peck Reservoir, would continue to receive limited recreation use.

Some improvement of the visitor contact station at Fort Peck would occur, and wildlife pastures at Fort Peck would continue to be maintained by COE.

Periodic maintenance of the existing self-guided wildlife tour route near Slippery Ann would occur. Existing access roads and recreation areas would be retained with limited maintenance or minor improvements. Private cabins would be retained.

Elk and pronghorn hunting would be on a limited (permit) basis while hunting for deer, upland game, and waterfowl would be open to all license holders. The use of free elk archery permits would be continued to collect data on archery hunting. No aerial hunting for coyotes would be allowed. All fishing and hunting would be in accordance with state regulations, formulated cooperatively by MDFWP and CMR personnel.

Cultural resources would be surveyed and preserved inaccordance with prevailing legislation and regulations.

MITIGATING MEASURES

Small scale fencing could occur on intermittent and continuous streams, ponds, and draws to improve riparian habitat and shrubs. The only other mitigating measures would be to select all or portions of the Proposed Action, Intensive Wildlife Management, or No Grazing alternatives.

ALTERNATIVE B

(Proposed Action)

OVERVIEW

The planning process was guided by the dual agency administration of FWS and COE (Appendix 3), the Executive Order establishing CMR (Appendix 4), national policy, information provided by the public, and long-range CMR goals. The planning process used for CMR is outlined in Appendix 1b. The Proposed Action is considered to be a practical solution that provides almost all of the wildlife habitat benefits of any of the alternatives. These benefits would take longer to occur than some alternatives, but could lessen off-refuge impacts. Considering the dual jurisdiction and land ownership patterns,it appears to be the most reasonable alternative.

The following constraints were established by FWS to govern the Proposed Action. To the extent these constraints are imposed by policy and not legislation, they are subject to change through public evaluation of the EIS.

1) FWS funds will not be spent for livestock where wildlife benefits cannot be identified in the process.

2) Water developments, fencing, farming, etc., are generally inconsistent with the refuge goals and will only be used when wildlife objectives cannot be accomplished through other measures.

3) Restoration practices such as shrub planting are consistent with refuge goals.

4) Insofar as possible, FWS will coordinate and standardize CMR livestock grazing systems, stocking rates, and seasons of use with adjacent landowners in common allotments as long as this does not prevent FWS from carrying out its mandates.

5) Public hunting, fishing, and trapping are appropriate uses of CMR lands as long as they are consistent with CMR's objectives.

GENERAL

Passage of Public Law 94-223 in 1976 solved the past jurisdictional problems with the BLM. Also, a Memorandum of Agreement was signed by the COE and the FWS in 1979. The agreement was signed to ensure that both agencies coordinate all future planning activities on the Charles M.

Russell National Wildlife Refuge. Joint management by agencies with differing legislative mandates creates potential for conflict; therefore, efforts would continue to simplify overlapping jurisdiction and eliminate potential problems.

The Proposed Action alternative would reach and maintain all the refuge objectives. A 33 percent average reduction in grazing would occur by 1990. Generally, the refuge would be grazed on a seasonal basis at light livestock stocking levels. The response of wildlife habitat would be closely monitored. If wildlife objectives were not being accomplished, additional changes in grazing would be implemented on specific areas not responding. These actions would include further reductions or increases in AUMs allocated to livestock, changes in seasons of grazing use, and other changes.

It is estimated that it will take 5-15 years of monitoring, depending on weather conditions and site characteristics, before adequate information is available to make these changes or estimate impacts.

ENDANGERED OR UNIQUE SPECIES

Two peregrine falcon reintroductions would be made at suitable sites, and six pairs of black-footed ferrets and several pairs of swift fox would be reintroduced on selected prairie dog towns as animals become available. Additional bighorn sheep would be introduced at selected sites as advisable to establish populations. Introductions would continue as necessary to establish viable populations.

HABITAT MANAGEMENT

An essential undertaking would be preparation of a Habitat Management Plan for each allotment by 1990. These plans would spell out specific wildlife habitat problems and provide specific management actions to correct the problems, such as grazing seasons of use, prescribed burning, planting, and rest from grazing if necessary. This would be coordinated with BLM in joint pastures. It is recognized that BLM and FWS have different management objectives for livestock grazing. Fences would be constructed where necessary to achieve each agency's objectives. The location of these fences would be determined after consultation between concerned parties when Habitat Management Plans are written for each allotment. Approximately 50 miles of boundary fence have presently been identified and are discussed further in range developments. Additional fencing may be required. These fences would not necessarily be on the refuge boundary. They could be constructed in the best and most practical locations. Other possibilities would be to locate new water facilities or implement specific grazing systems designed to reach each agency's objectives in suitable common allotments.

The habitat evaluation criteria (Appendix 2) would be upgraded as more information becomes available. In addition, various sampling techniques would be established to monitor at prescribed intervals long-term changes in wildlife habitat and range conditions. Different treatments of the habitat would be employed if these evaluations indicated that wildlife objectives were not being reached. Other management surveys would be as described under the No Action alternative.

The most significant management actions to achieve habitat objectives would be reductions of livestock grazing, changing livestock seasons of use, and habitat treatment practices such as prescribed burning. Overall proposed livestock levels would be approximately 33 percent below current federal AUM levels on the refuge. Livestock grazing would be utilized as required, to maintain existing plant communities at desired habitat conditions.

Deciduous shrub quantity and quality would be increased by prescribed burning of 1,900 acres by 1990, and a total of 7,700 acres by the year 2005. Planting would be done on 100 acres by 1990, and a total of 500 acres by the year 2005. Habitat analysis indicates deciduous shrub communities are in short supply on the refuge, and historical accounts indicate shrubs were once more abundant than they are today. A combination of actions would be taken to improve the present situation. The aforementioned Habitat Management Plans would determine the best means of reestablishing shrubs on each allotment. Management actions would probably be adjustment in grazing, burning, and planting, in that order. Shrubs would be planted to reestablish a seed source for natural revegetation. It is estimated that this would involve approximately 25 acres/year depending on success of grazing adjustments and burning.

Following burning or planting, there would be no grazing allowed for two to three years or longer, if necessary, to ensure successful establishment of the desired vegetation.

Cooperative farming and haying would be phased out in the bottoms along the Missouri River at the west end to restore natural river bottoms. Lure cropping would be tried on the east end to decrease elk depredation on adjoining private croplands. Six miles of fence enclosing about 900 acres would be constructed from 1980-2000 to protect selected riparian zones from livestock and enhance shrub reproduction.

Since actions to be undertaken would be constrained by the interspersed ownership of federal, state, and private lands, several priority land purchases totalling approximately 2,000 acres would be attempted on a willing seller basis by 1990.

Additional purchases would occur as money becomes available. Two allotments would be changed from domestic sheep to cattle use by 1990. These allotments are located in the potentially best pronghorn range on the refuge, but where pronghorn habitat components are depressed. Domestic sheep would be eliminated from the refuge unless needed on a prescription basis to manipulate vegetation.

A policy for fire management would provide for modified suppression areas and prescribed burns and would protect fragile habitats, valuable coniferous areas, critical wildlife habitats, recreational developments, and other private and refuge developments.

Fisheries management would consist of cooperating with MDFWP in stocking programs and enforcement of fishing regulations while trying to protect water courses and revegetate streambanks in poor condition.

Predator control to reduce livestock losses would be the same as the No Action alternative. Coyote control to benefit other wildlife species would occur only as a last resort as stated in the EIS for Operation of the National Wildlife Refuge System. Several methods of control are listed with killing of coyotes last. Small mammals would be controlled only if a health hazard was apparent. Prairie dog control would also be the same as the No Action alternative. Weeds would be controlled as with the No Action alternative.

FORAGE ALLOCATION

Livestock grazing on CMR would be substantially reduced to improve habitat conditions for wildlife. Proposed livestock grazing levels would be 40,482 federal AUMs by 1990, which represents a 33 percent average reduction from present federally licenses AUMs. This reduction would range from 0-100 percent depending on the allotment (Appendix 5). Three small livestock allotments would be eliminated, and four allotments would be incorporated as pastures into other allotments leased by the same permittee.

Each allotment was examined in terms of existing range conditions (Appendices 8 and 9), slope and water factors (Appendix 15), and soil limitations (Appendix 7). Concurrently, wildlife habitat conditions (Appendix 2) were evaluated by allotment and deficiencies noted. In the majority of the areas where habitat evaluation demonstrated existing livestock/wildlife conflicts, slope/water factors and soil limitations provided the necessary grazing change. In the remaining areas where habitat deficiencies affected by livestock grazing still remained, grazing was adjusted to allow the achievement of applicable wildlife objectives. This process determined that light grazing (0-35 percent utilization), coupled with various seasons of use, would achieve the diversity of habitat conditions mandated by the refuge goals and objectives.

Most livestock grazing would continue to be on a seasonal (winter, spring, summer, fall, or combination thereof) basis, although spring turn-in dates would be later and grazing reduced to light stocking levels. Grazing would be employed as a management tool to provide certain habitat conditions to benefit a particular wildlife species.

In general, there would be no early spring use in allotments. Turn-in dates for livestock would be delayed until late spring to avoid significant conflicts with wildlife.

Several allotments have been identified as possessing potential for combination into specialized grazing systems with BLM, state, and private landowners. Early spring use in existing pastures would be rotated with other pastures inside or outside CMR to eliminate spring use in the same pastures on a recurring annual pattern. Close cooperation, especially between BLM and FWS, would be needed on common pastures to ensure successful implementation of specialized grazing systems.

Existing specialized grazing systems would be modified, as needed, when management plans for the allotments are written. Periodic evaluations of how well these grazing systems are pro-viding desired habitat quality for wildlife will ultimately determine the degree to which specialized systems would be used on the refuge.

In years of below average forage production due to drought, fires, insects, or other natural causes, grazing permits might be suspended in whole or in part as necessary to minimize damage to range and wildlife resources.

RANGE DEVELOPMENTS

Most grazing allotments on CMR adjoin unfenced state and BLM land. Preparation of habitat management plans would involve close coordination to devise specific management actions necessary to meet agency and the individual landowners' objectives. Boundary fences would be built where necessary. Fences would be 42 inches high, 3-strand, with 12 inches between wires. The bottom wire would be 18 inches above the ground and smooth in areas where pronghorns would likely encounter fences.

So far, approximately 50 miles of fencing needs have been identified along the CMR boundary to keep livestock numbers within authorized levels. Fencing would occur in a minimum of six allotments by the year 2000. Other portions of the boundary would be fenced if problems arise regarding unauthorized livestock use. A limited amount of interior fence would be built.

New water development projects would be limited to those that enhance watershed, wildlife, and recreation programs; however, no allotment would be left without water. A need for three new stock ponds plus one pipeline and several troughs has been identified. Periodic maintenance of existing range developments would occur on an as-needed basis.

RECREATION AND CULTURAL RESOURCES

Public access would be provided to various portions of CMR (Figure 1), and water access by boat and seaplane throughout the length of the refuge would be stressed.

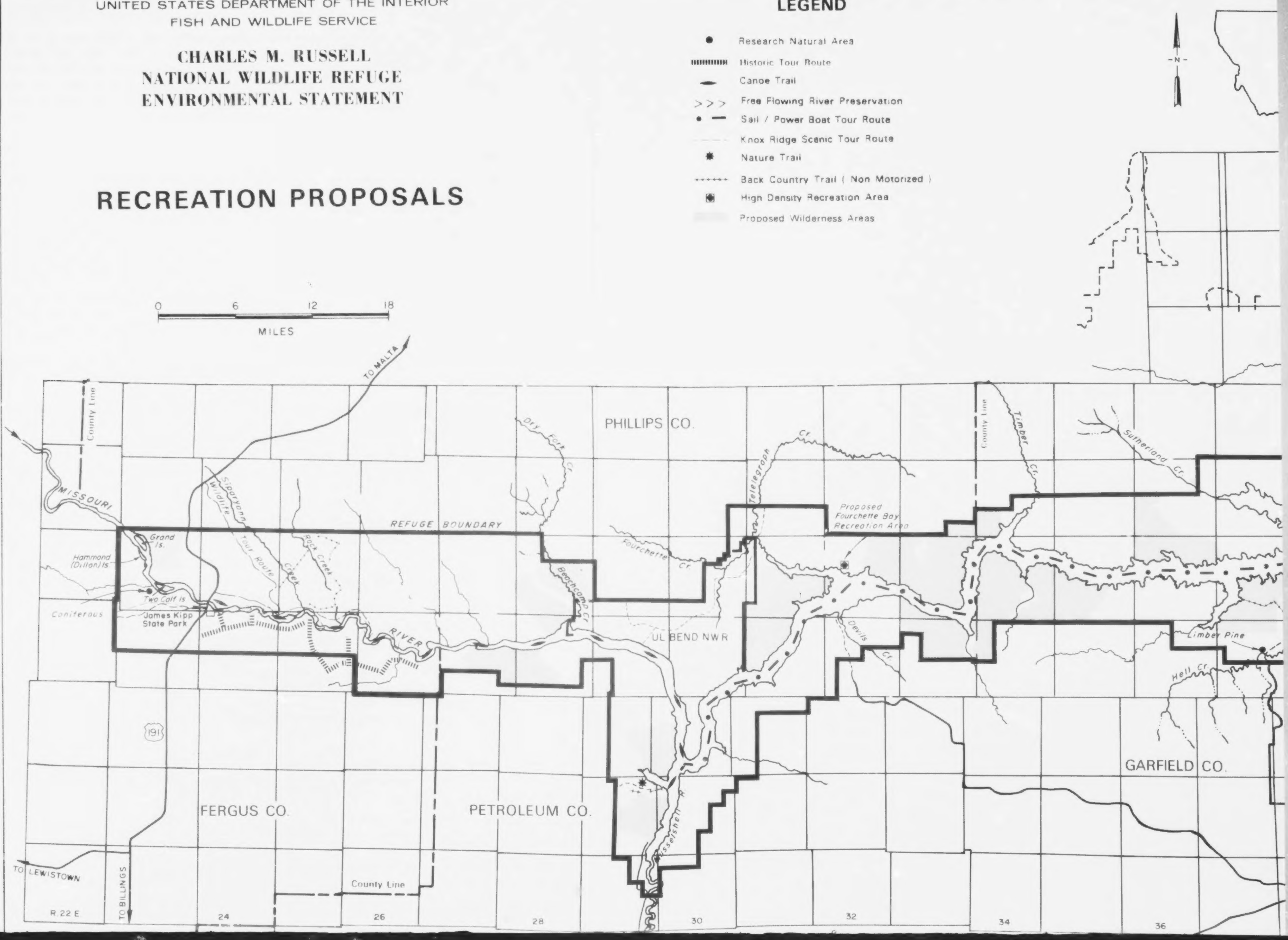
UNITED STATES DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE

CHARLES M. RUSSELL
NATIONAL WILDLIFE REFUGE
ENVIRONMENTAL STATEMENT

RECREATION PROPOSALS

LEGEND

- ● Research Natural Area
- ▮▮▮▮ Historic Tour Route
- ▬ Canoe Trail
- >>> Free Flowing River Preservation
- • — Sail / Power Boat Tour Route
- - - Knox Ridge Scenic Tour Route
- ✸ Nature Trail
- ·+·+·+ Back Country Trail (Non Motorized)
- ▣ High Density Recreation Area
- ▨ Proposed Wilderness Areas



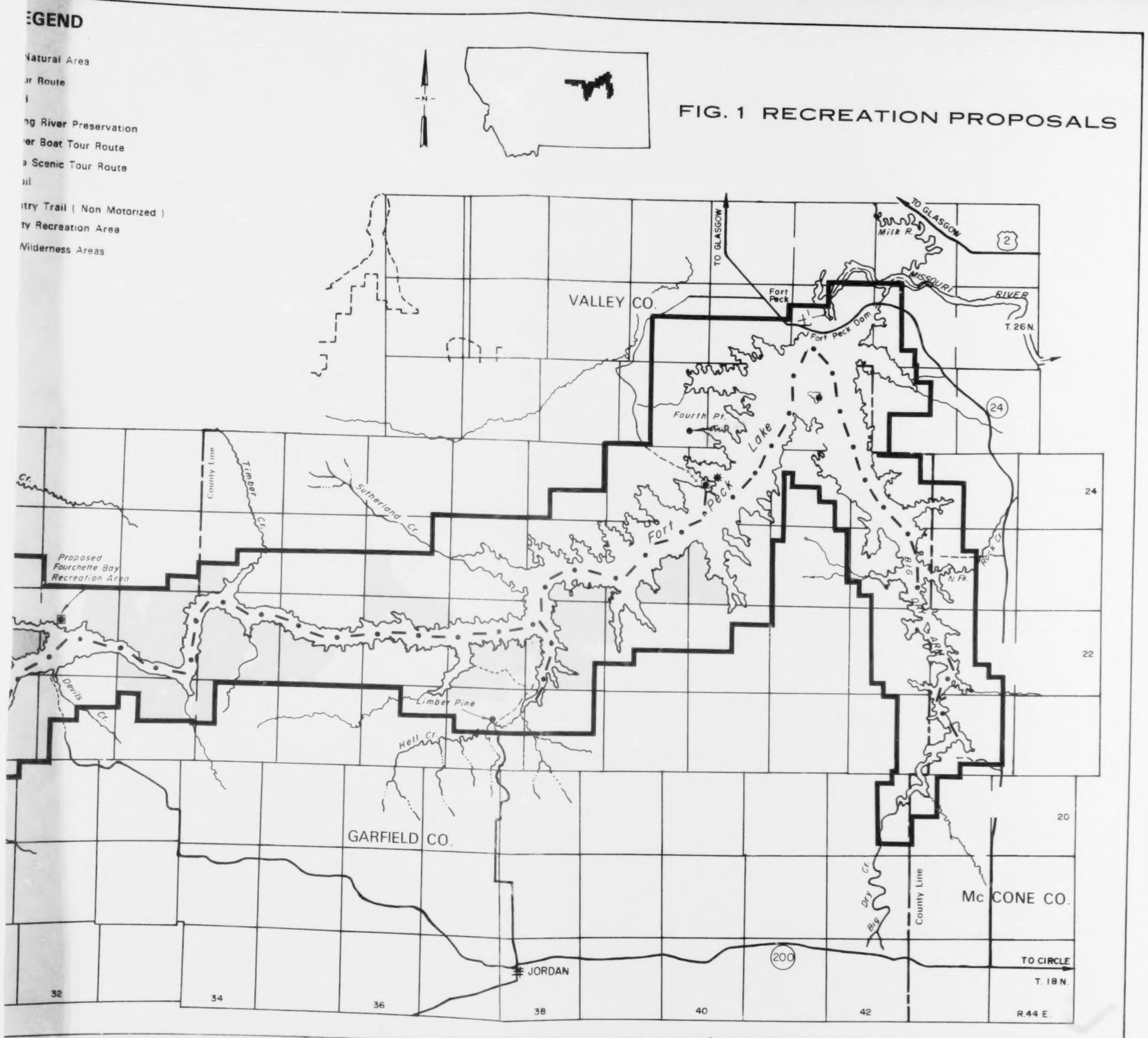


FIG. 1 RECREATION PROPOSALS

Among new programs would be enhancement and preservation of the Missouri River (below the nationally designated segment) from Fred Robinson Bridge to headwaters of the Fort Peck Reservoir. The FWS, COE, and MDFWP will coordinate to ensure the best possible fishery management within the primary COE mandates of flood control, navigation, irrigation, and power generation.

A cooperative management plan would be prepared with BLM, COE, and MDFWP for the Slippery Ann area by 1990. Of special concern would be nearby sites that could replace or complement James Kipp State Park which is periodically flooded, the existing wildlife tour route, enhancing opportunities to view wildlife, needed provisions for accommodating floaters who use the Upper Missouri National Wild and Scenic River, and an interagency visitor contact-interpretive center. Visitor contact stations would be constructed at Fort Peck, Malta and Lewistown in cooperation with other interested agencies such as COE, BLM, MDFWP, and MDSL.

A historic tour route would be designated along the Sand Creek trail south of the Missouri River. Various historicbuildings and sites located along this route would be marked and interpreted.

A scenic tour route following the existing Knox Ridge road would focus attention on the Missouri River valley and its associated wildlife.

Certain lands such as research natural areas, paleontological areas, islands, and special wildlife areas would be identified as environmental education study areas for use by various institutions and organizations. York Island, a site on Fourth Point, and a limber pine community near Hell Creek State Park, would be recommended for research natural areas on the eastern portion of the refuge because of their unique plant communities. A coniferous forest community lying east of the mouth of Two Calf Creek on the west portion of the refuge would be recommended for a research natural area because of its vegetative features.

From Fred Robinson Bridge to Crooked Creek Recreation Area, a 50-mile self-guided canoe trail (about 25 miles along the undesignated free-flowing segment of the Missouri River and another 25 miles from the headwaters of Fort Peck Reservoir to Crooked Creek) would be established, paralleling the route followed by Lewis and Clark. Where possible natural, historic, and other features would be interpreted along the route.

A 140-mile sail-powerboat tour route would be designated on Fort Peck Reservoir, connecting existing and proposed major recreation areas. In addition to a brochure describing the route and points of interest along the way, signs and markers would be placed at campsites and boat access areas along the shore.

At appropriate locations on the refuge, exhibits would be provided to explain wildlife, geologic, historic, and related features.

As recreation demands and needs dictate, approximately 30 miles of backcountry (nonmotorized) and nature trails would be designated at several locations. These trails would be self-guiding or could be used as part of a guided interpretive program.

As with the No Action alternative, wildlife pastures would continue to be maintained by COE at Fort Peck. Interpretation of the wildlife display pastures would be integrated with the visitor contact station at Fort Peck.

Existing private cabin areas would remain and no new cottage areas would be developed.

All existing roads and trails including those that have been closed would be periodically evaluated to determine those that should be developed, improved, realigned, or closed. Established roads would be marked to guide visitors. Cooperative agreements would be negotiated with affected agencies to ensure coordination of road improvement and maintenance, both on and off CMR, leading to upgraded recreational facilities.

Where compatible with wildlife and in consultation with COE, areas for seaplane landings on Fort Peck Reservoir would be established as needs dictate.

An additional boat launching, camping, and fishing access site would be developed at Fourchette Bay on the north side of the reservoir. As demands increase, facilities would be expanded by COE at existing recreation areas.

Wildlife populations would be harvested within the capacity of the resource. Primitive sport fishing access sites would be provided at a number of locations throughout the refuge.

Qualified cultural structures and sites would be officially designated through nominations to the National Register of Historic Places or to other appropriate lists. Surveys of the areas would be conducted to comply with Executive Orders or legislation.

MITIGATING MEASURES

If wildlife objectives were not being accomplished under the Proposed Action, several courses of action would be available. As ranches were sold, grazing privileges could be retired across CMR until approximately 15-20 no-grazing areas were established. These no-grazing areas would be used by cattle from other actively grazed allotments needing rest to produce desired vegetation. Once accomplished, this would contribute to the objective of stabilizing livestock use. In drought years, some use could be made of these areas when the normally grazed areas would not produce enough vegetation for wildlife and livestock. If constraints listed at the beginning of this alternative were softened to allow construction of stock ponds, fencing, and other management facilities, options would be available to mitigate some impacts on individual ranchers as well as allow suitable farming and still reach or exceed wildlife objectives.

Presently, however, stock ponds, interior fencing, and farming are generally inconsistent with refuge goals and are not available as mitigating measures.

Another measure would be to fence riparian zones (intermittent streams, river banks, and reservoir shorelines) where desired results were not being obtained. These have traditionally been considered as sacrifice areas on CMR due to concentrations of livestock that occur from normal grazing operations. However, to restore and maintain all important riparian areas without fencing, livestock grazing would have to be eliminated in the entire allotment where it occurs (Hormay 1976).

Minimal farming on the uplands and some bottoms, if done properly, could benefit some wildlife on CMR, especially turkeys, ring-necked pheasants, white-tailed and mule deer, elk, sharp-tailed grouse, raccoons, gray partridge, waterfowl, sage grouse, white-tailed jackrabbits, and most seed-eating birds. This management practice is also not available due to the policy constraints placed on this alternative.

The areas needing wildlife habitat improvement on the refuge could be placed in a no-grazing category for several years, then grazed by livestock as stated in the proposal. This would improve habitat conditions in a shorter time.

AUM reductions could be spread over a longer time than five years which would reduce, but not eliminate, impacts to some livestock operators using the refuge, but would delay wildlife habitat improvement.

Should recreation activities result in significant conflicts with wildlife, the FWS will coordinate with other agencies to resolve the problem.

ALTERNATIVE C

(Intensive Wildlife Management)

GENERAL

This alternative results in the greatest wildlife benefits and involves several interrelated components: reducing grazing to approximately 27,000-30,000 AUMs, purchasing inholdings to control grazing, removing private cabins, and intensive wildlife habitat manipulations. Under this alternative, AUMs would only be allocated to livestock as needed for vegetative manipulation to benefit wildlife. Conflicts that arise with COE concerning the removal of private cabins will be coordinated and resolved in compliance with the Memorandum of Agreement between COE and FWS (see Appendix 3). Many private inholdings would be purchased and arrangements made with SLB to trade, lease, and possibly sell key state lands. Approximately two-thirds (290 miles) of the refuge boundary (400 plus miles) would be fenced. Intensive wildlife habitat manipulation proposals such as fencing, farming, and pond development would require modification of planning policy constraints for CMR (see pageparagraph 2).

ENDANGERED OR UNIQUE SPECIES

Reintroduction of peregrine falcons, black-footed ferrets, swift fox, and bighorn sheep would occur as in the Proposed Action alternative. Bison would be introduced at UL Bend on 30-35 sections of enclosed land.

HABITAT MANAGEMENT

Management surveys would be conducted similar to those proposed under the No Action alternative with slight expansion in number of species sampled and intensity of sampling. Facilities for geese at Slippery Ann would be maintained. Additional waterfowl production areas at U L Bend would be created through damming natural runoff water into 34 ponds and associated wetlands, totalling approximately 900 acres.

Habitat analyses would be conducted as stated under the Proposed Action alternative.

Livestock grazing would only be used as a management tool on a prescription basis to remove rank vegetation or to alter vegetation to reach desired habitat conditions for wildlife. Extensive burning, planting, prescription grazing, and cultivating suitable land would be the main management tools under this option. To implement this grazing pattern, many private inholdings would be acquired from willing sellers and agreements would be negotiated with SLB to acquire state inholdings. At present, the majority of inholdings are unfenced. Fencing some of the isolated parcels would be impractical and expensive if private and state lands were to be retained under present ownership and grazing practices.

Shrub quantity and quality would be increased from fair to excellent condition by burning 3,800 acres by 1990, and a total of 15,000 acres by the year 2005. It is estimated that shrub planting would be carried out on 800 acres by 1990 and on a total of 3,000 acres by the year 2005. In addition, intensive farming would be conducted on approximately 2,000acres of land to provide food interspersed with shelterbelts and other cover for deer, upland birds, elk, and other wildlife. This would include substantially increased farming in some river bottoms and other suitable areas to increase the food supply for white-tailed deer, as well as many other riparian species. Some small but important riparian zones across CMR would be excluded temporarily from big game use by fencing. This would allow these zones to revegetate and provide excellent quality habitat.

Elk lack adequate security cover from Timber Creek (west) to Fort Peck; this situation would be improved by planting ponderosa pine at various locations. Fire management would be the same as the Proposed Action alternative.

Fisheries management would include stocking and regulations enforcement as outlined in the Proposed Action alternative, as well as protecting water courses and revegetating impoverished areas. In addition, some bays would be diked offto establish littoral vegetation for spawning, and concrete spawning runs would be established for use by salmonids.

Control of predators to protect livestock and control of prairie dogs would be the same as the No Action alternative. Coyote and small mammal control to benefit other wildlife species would occur only as a last resort as stated in the EIS for Operation of the National Wildlife Refuge System (Fish and Wildlife Service 1976) and the Migratory Bird Program Management Document Goal #5 (Fish and Wildlife Service 1980).

Weeds would be controlled as with the No Action alternative.

FORAGE ALLOCATION

Livestock grazing would be employed as a tool to achieve or maintain desired habitat conditions. Generally, livestock would be grazed at moderate levels with alternate spring-summer use. Each year of use would be followed by two years of complete rest. Site specific treatments would vary depending on wildlife species' needs and the condition of the vegetation. Treatments would include specific grazing prescriptions and other habitat treatments, such as fire. Federal livestock levels grazed on an annual basis would be approximately one-third those presently authorized. About 23,000 AUMs would be provided for livestock use by 1990. Wildlife would receive about 87,500 AUMs by 1990 to fulfill habitat needs.

By the year 2005, there would be an estimated maximum of 27,000-30,000 livestock AUMs grazed on CMR annually. Wildlife would receive about 107,000 AUM's for food and habitat enhancement.

RANGE DEVELOPMENTS

Range improvements would be limited to approximately 290 miles of boundary fence to regulate livestock. Interior fencing would be removed in smaller pastures and water facilities would be maintained where needed. Range improvements such as fences or ponds on marginal sites having soils, geological, or wildlife conflicts would be removed or allowed to deteriorate. Soil ripping would occur on nearly all suitable sites (38,000 acres) on the refuge, with the exception of wilderness areas, to improve wildlife habitat and reduce soil erosion.

RECREATION AND CULTURAL RESOURCES

This alternative is similar to the Proposed Action alternative for recreation. However, there would be a somewhat lower level of public use and facility development.

Unlike the Proposed Action alternative, no backcountry (non-motorized) trails would be developed, and only nature trails would be provided.

Private cabins presently situated on CMR at The Pines, Fort Peck, Rock Creek State Park, and Hell Creek State Park would be removed as the leases terminate. The areas would be rehabilitated into suitable wildlife habitat.

There would be no development of low density recreation areas; additional fishing access sites would be provided instead. Existing high density recreation areas would be expanded by COE as needs dictate. Any recreational uses or activities conflicting with normal wildlife activities would be controlled by excluding such use during critical seasons.

Cultural resources would be treated as outlined in the Proposed Action.

MITIGATING MEASURES

Retirement of all livestock grazing in a given area could be employed if competition with wildlife is determined to be a limiting factor affecting a wildlife species.

Gradual reductions in the livestock grazing program would soften impacts of reduced livestock levels on individual operators, but would delay wildlife habitat improvement.

ALTERNATIVE D

(Multiple Use)

GENERAL

This alternative would not be possible to implement unless Congressional action changed CMR from a national wildlife refuge to a multiple use management area. It will not accomplish the wildlife and range objectives of the refuge.

ENDANGERED OR UNIQUE SPECIES

Reintroduction of peregrine falcons, swift fox, and bighorn sheep would occur as in the Proposed Action alternative. One or more pair of black-footed ferrets would be reintroduced, if they became available.

HABITAT MANAGEMENT

Management surveys would continue as described in the No Action alternative, as would development of areas for geese at Slippery Ann and Fort Peck. Waterfowl ponds and nesting structures would be expanded at U L Bend through damming of natural runoff waters to include 34 ponds and associated wetlands, totalling about 900 acres.

Grazing would be initially reduced and then gradually increased over current levels as range conditions improve. Portions of the riparian zone along the Missouri River would be grazed on a prescription basis. Cooperative farming would continue as described under the No Action alternative, or be increased.

Predator control to reduce livestock losses would occur under the same guidelines as on adjacent land, including aerial gunning. Prairie dog control would be as stated under No Action. Other small mammal control would be as stated under Intensive Wildlife Management. Coyote control to protect other wildlife would be as stated under the Proposed Action.

Weeds would be controlled as with the No Action alternative.

FORAGE ALLOCATION

Livestock would receive approximately one-half the allocated forage. Initially, there would be temporary reductions in present livestock AUMs from 56,000 active to 52,000. The Rock Creek ungrazed area would be opened to livestock grazing. Temporary livestock nonuse of allotments in deteriorated condition and soil ripping of all suitable panspots and dense clay sites would provide a forage increase of several thousand AUMs for livestock and wildlife over present levels because of improved range conditions. Wildlife would ultimately be allocated about 60,000 and livestock 61,000 AUMs on federal lands within the refuge.

RANGE DEVELOPMENTS

As many as 12 additional allotments would have new grazing systems implemented by the year 2005. The six allotment presently in rest-rotation systems and the three deferred rotation systems would be maintained.

Range improvements such as fencing, water developments, or mechanical treatment of soils would be based upon allotment needs.

RECREATION AND CULTURAL RESOURCES

All recreation proposals discussed in the Proposed Action alternative would occur. In addition, a backcountry foot and horse trail extending the length of CMR on the north side of the Missouri River would be designated. This trail would provide the closest land route paralleling the historic Lewis and Clark trail. Some primitive campsites would be located along this route, and historic and natural features would be interpreted. The trail would be nominated as a component of the Lewis and Clark National Historic Trail upon completion of a comprehensive plan for the historic trail by the National Park Service.

A perimeter shoreline scenic road extending 21 miles along the north shore of Fort Peck Reservoir on the east side of the refuge would be constructed. The road would be built by COE near the lakeshore to provide optimum viewing opportunities. Primitive campsites would be established at a number of locations throughout the refuge. High and low density recreation areas described for the Proposed Action alternative would be expanded as needs dictate. New cabin site areas and expansion of existing cabin site areas would be made available as demand increased.

MITIGATING MEASURES

Fencing riparian zones and ponds where no rotation systems are employed would encourage development of riparian communities. Otherwise, vegetation in these important locations would not attain desired levels.

Implementation of several new rotation grazing systems on the refuge should provide some increased habitat quality and might eliminate the need to fence riparian areas in allotments with rotation systems.

Livestock allotments not meeting management goals could be placed in a nonuse status for as long as needed to achieve desired results. Operators would be required to accept nonuse or take use in another portion of the refuge.

Habitat manipulation treatments would be provided if needed to maintain a diversity of habitat conditions to favor certain wildlife species. The proposed levels of livestock grazing would limit wildlife habitat potential. An improvement would occur under this alternative, but the amount of improvement over present conditions would be slight.

ALTERNATIVE E

(No Grazing)

GENERAL

This alternative would not be in compliance with Executive Order 7509. The Executive Order requires that excess forage be allocated to livestock, and this alternative allocates none. It would accomplish the wildlife and recreation objectives, but not the range objective. The purchase of all private and state lands would require changes in SLB policy and large increases in funding.

ENDANGERED OR UNIQUE SPECIES

Reintroduction of peregrine falcons, black-footed ferrets, swift fox, and bighorn sheep would occur as in the Proposed Action alternative.

HABITAT MANAGEMENT

Management surveys and habitat analyses would be implemented as stated under the Proposed Action alternative.

Prescribed burning of 11,300 acres would enhance vegetative productivity, particularly for forb and shrub species. In addition, 500 acres would be planted to shrubs, and six miles of temporary wildlife exclosure fence would be constructed around 960 acres; 2,000 acres would be cooperatively farmed. Ponderosa pine would be planted to improve elk habitat.

Fire suppression, prescribed burning, and fisheries management would be as stated in the Proposed Action alternative.

Prairie dog and small mammal control would be the same as the No Action alternative. Coyote control would occur as required for the benefit of other wildlife species. There would be no predator control to protect livestock on the refuge as no livestock would be present. Predator control to reduce livestock losses on adjacent lands would be as stated in the No Action alternative.

Weeds would be controlled as with the No Action alternative.

FORAGE ALLOCATION

Livestock grazing would be reduced by about 10 percent annually through 1990 on federal lands. All federal AUMs would be retired by the year 2005.

Private and state inholdings would be purchased or acquired through exchange, and these AUMs would be retired by the year 2005.

All forage produced beyond plant and soil resource needs would be available for wildlife food and cover. Range conditions would improve substantially, and essentially, all the good condition range would be in excellent condition by the year 2005. This would provide wildlife food and cover.

RANGE DEVELOPMENTS

Range improvements would involve soil ripping as much as 10,000 acres of panspots and dense clay range sites to improve vegetative productivity for wildlife food and cover. A few larger reservoirs would be maintained for waterfowl production and, in some cases, fishing. Nearly all other range improvements would be removed or allowed to deteriorate. The refuge boundary would be fenced to prevent unauthorized livestock use. All fences would be constructed as stated in the Proposed Action alternative.

RECREATION AND CULTURAL RESOURCES

There would be no additional facility development or changes from the Proposed Action alternative.

MITIGATING MEASURES

If habitat quality for wildlife species associated with several vegetative communities declined, treatments such as prescribed burning, chemical treatments with herbicides, or plowing could be employed to promote habitat diversity to benefit these species.

Gradual reductions in livestock levels would soften the impact upon livestock operators, but would delay wildlife habitat improvement. There would be no other mitigating measures to help the livestock operators.

COMPARISONS OF ALTERNATIVES

It must be recognized that a complex and controversial situation occurs at CMR due to Fort Peck Dam and Reservoir, state and COE recreation areas, the town of Fort Peck, private and state inholdings, and past management practices where livestock was equal or dominant to wildlife (the 1952-53 range survey allocated 62 percent of the total AUMs to livestock and 38 percent to wildlife).

Tables 1-3 summarize the impacts of the alternatives at CMR.

The Proposed Action alternative would attain habitat objectives for wildlife refuge-wide by 2005. Moreover, elk and pronghorns would receive additional benefits as they move on the refuge for part of their life cycle. The refuge would be managed in a natural setting for the most part, with intensive wildlife habitat and range improvement programs held to a minimum. Livestock grazing would be permitted, generally, on a seasonal use basis at light stocking levels. Special grazing schemes would be used in those areas where light stocking rates were not satisfactory. Generally, this level of grazing has been determined to be consistent with wildlife objectives. The Proposed Action would be accomplished at moderate cost, with significant increases in wildlife values.

Although it is the most desirable for wildlife, the Intensive Wildlife Management alternative would reduce the naturalness of the refuge and be very costly to implement. Purchasing many of the private inholdings would be expensive, and a change in SLB policy to allow state land to be leased, exchanged, or sold would be required. FWS policy would be modified to allow intensive habitat manipulation such as farming, fencing, and pond development. Phasing out of private cabins would require resolution within the Memorandum of Agreement with COE.

Livestock would be utilized as a management tool to achieve desired habitat conditions and wildlife objectives by the year 2005 or before. However, consolidation of many inholdings into federal ownership would facilitate CMR management. Also, cooperative farming would provide key areas of increased diversity and food sources for wildlife.

As compared to the Proposed Action, changes in livestock numbers under Intensive Wildlife Management would not significantly enhance wildlife habitat unless all other proposed treatments were also provided. However, intensive developments as proposed by the Intensive Wildlife Management alternative are inconsistent with current policy constraints. On a dollar for dollar basis, the Proposed Action provides a greater benefit to wildlife than Intensive Wildlife Management. Wildlife objectives refuge-wide would be met or exceeded before the year 2005.

Table 1. Summary comparison of implementing various management alternatives on Charles M. Russell National Wildlife Refuge, Montana.

	No action	Proposed action	Intensive wildlife management	Multiple use	No grazing
Meet objectives					
Wildlife	No	Yes	Yes	No	Yes
Range	No	Yes	No	No	No
Recreation	No	Yes	Yes	Yes	Yes
Habitat quality					
Conifer community	0	0	+	0	+
Deciduous shrub communities	0	+	++	0	++
Residual cover (grasslands)	0	++	+++	+	+++
Riparian areas	0	+	++	0	++
Sagebrush-greasewood flats	0	+	+	+	−
Off-refuge impacts to wildlife habitat	0	−	=	0	≡
Wildlife species					
Bighorn sheep	0	+	+	0	+
Elk	0	++	++	+	++
Mule deer	0	+	++	0	+
Prairie dogs	0	+	+	++	−
Pronghorns	0	+	+	+	+
Sharp-tailed grouse	0	++	+++	0	+++
Waterfowl	0	+	+++	++	+
Range condition	0	++	+++	+	+++
Livestock AUMs	0	−	=	+	≡
Recreation use	+	++	++	+++	++

0 equals minimal change from present condition.

+, ++ or +++ equals an improvement in quality and/or quantity from present condition.

−, = or ≡ equals a lowering in quality and/or quantity from present condition.

Table 1a. Direct plus indirect impacts of change in livestock production on sales and employment.

Management Alternatives		Changes in Sales from Current Use to Alternative Actions [1]	Input-Output Business Multiplier [2]	Direct plus Indirect Change in Local Sales	Input-Output Employment Multiplier [2]	Direct plus Indirect Chang in Local Employment
PROPOSED ACTION	1990	$- 347,000	2.67	$- 926,490	.379x10^{-4}	-13
	2005	- 352,000	2.67	- 939,840	.379x10	-13
INTENSIVE WILDLIFE MANAGEMENT	1990	- 725,000	2.67	- 1,935,750	.379x10	-27
	2005	- 641,000	2.67	- 1,711,470	.379x10	-24
MULTIPLE USE	1990	- 249,000	2.67	- 664,830	.379x10	- 9
	2005	- 79,000	2.67	- 210,930	.379x10	- 3
NO GRAZING	1990	- 567,000	2.67	- 1,513,890	.379x10	-21
	2005	- 1,122,000	2.67	- 2,995,740	.379x10	-43

1. Source: Linear programming analysis conducted in this study.
2. A type II multiplier which includes households (labor) as part of the interdependent local economy is applied to changes in livestock industry sales. The assumption that households respend part of their incomes in the local economy and that all of livestock output is exported out of the six county study region provides an upper bound on local impacts.

Table 2. Direct plus indirect impacts in tourist visits on sales and employment.

Management Alternatives		Change in Sales from Current Use to Alternative Actions 1	Input-Output Weighted Business Multiplier 2	Direct plus Indirect Change in Local Sales	Input-Output Weighted Employment Multiplier 2	Direct plus Indirec Change in Local Employment
Proposed Action	1990	$+ 92,040	1.77	$+ 162,911	.383 x 10^{-4}	+ 4
	2005	+ 276,120	1.77	+ 488,520	.383 x 10	+11
Intensive Wildlife Management	1990	- 92,040	1.77	- 162,911	.383 x 10	- 4
	2005	- 613,600	1.77	- 1,086,072	.383 x 10	-24
Multiple Use	1990	+ 368,160	1.77	+ 651,643	.383 x 10	+14
	2005	+ 1,043,120	1.77	+ 1,846,322	.383 x 10	+40
No Grazing	1990	+ 153,400	1.77	+ 271,518	.383 x 10	+ 6
	2005	+ 337,480	1.77	+ 597,340	.383 x 10	+13

1 Source: Visitor days presented in Appendix Table 17a, in C.M. Russell National Wildlife Refuge Draft E.I.S. Table 17-A, Appendix. Estimated by subtracting visitor days for "no action" from visitor days for the various management alternatives and multiplying the difference by $30.68. The latter figure is the estimate of daily per person expenditures reported earlier from the Wyoming tourism study.

2 Source: Weighted average of multiples for goods purchased by tourists. See text and Table 3.

Table 3. Total Impacts of Change in Livestock Production and Tourism.

Management Alternatives		Total Change in Sales	Total Change in Employment	Percent Change in Employment
Proposed Action	1990	$- 763,579	- 9	-.1%
	2005	- 451,320	- 2	-.03%
Intensive Wildlife Management	1990	- 2,098,661	-31	-.5%
	2005	- 2,797,542	-48	-.8%
Multiple Use	1990	+ 13,187	+ 5	+.09%
	2005	+ 1,635,392	+37	+.6%
No Grazing	1990	- 1,242,372	-15	-.2%
	2005	- 2,398,400	-30	-.5%

Source: Calculated from data shown on Tables 1 and 2.

Table 3a. Comparison of Direct Effect on CMR Ranchers.

Management Alternatives		Percent Change in Gross Income and Sales
Proposed Action	1990	-3.2%
	2005	-3.3%
Intensive Wildlife Management	1990	-6.8%
	2005	-6.0%
Multiple Use	1990	-2.3%
	2005	- .7%
No Grazing	1990	-5.3%
	2005	-10.5%

Source: Linear Programming Outputs. See Appendix for detailed Tables.

The Multiple Use and No Action alternatives do not provide a wildlife refuge situation. Livestock grazing would be equal to or above wildlife for resource allocations. While popular with area or regional residents, these alternatives fall short of accomplishing the wildlife habitat potential of CMR. Management under Multiple Use could occur only if authorized by Congressional action.

The complete elimination of livestock from the refuge under the No Grazing alternative or severe reductions in the Intensive Wildlife Management alternative would likely cause wildlife habitat adjacent to the refuge to decline as livestock operators attempt to make up for forage no longer available from Federal lands by increasing stocking levels on private lands. Private land closures to public use, already a problem in the area, could be expected to accelerate, further jeopardizing farmer/recreationist/State/Federal relations. Land purchase and total fencing of the boundary would be expensive, and the additional benefits gained for wildlife would be slight. Wildlife objectives would be met or exceeded by the year 2005 for most wildlife species.

Recreation would continue with no major change or emphasis from present management under the No Action alternative. Under the other alternatives, there would be more emphasis on providing the public an opportunity to enjoy compatible wildlife recreation. Preservation of cultural resources in compliance with Executive Order 11593 would occur in all alternatives. Roads to recreation areas, additional fishing access sites, expansion of some existing recreation areas, development of a scenic tour route and interpretive facilities, and a new recreation area on Fourchette Bay are proposed for all but the No Action alternative. A notable difference under the Intensive Wildlife Management alternative would be the elimination of private cabins from the refuge. The Multiple Use alternative proposes additional recreation development. Except for the No Action alternative, participation in wildlife-oriented recreation activities would be expected to increase, as wildlife populations increase, due to the greater opportunities for viewing, photographing, and hunting. Due to the remoteness of the area, rising costs of fuel for transportation, the small increase in population that is projected, and competing recreation resources in the region, recreation use on CMR is not expected to significantly impact wildlife under any of the alternatives.

SOCIOECONOMIC COMPARISONS

None of the alternatives have a significant effect on income or employment in the six-county region. As Table 3 shows, net employment effects for all the alternatives involve changes (positive and negative) of less than 1 percent in employment. The net change in direct and indirect employment with the Proposed Action is a loss of seven workers in 1978-90 and two from 1986-2005.

The direct effect on the ranchers, while of greater significance than to the regional economy, is still relatively insignificant. As Table 3a illustrates, the Proposed Action results in only a 3 percent loss in gross income or sales. The reason for the lack of significance is that a majority of the ranchers are dependent on the CMR on an average for only 13 percent of their livestock forage. Direct losses in hired labor is less than five workers for any alternative.

The direct effect on the tourism dependent sectors (retail trade, services, and gasoline) from the change in recreation is positive for all alternatives, except Intensive Wildlife Management. Direct and indirect employment is slightly increased in the tourism dependent sectors. The changes (positive and negative) in regional employment from the recreation components of the plan are relatively insignificant.

Thus, no alternative under consideration has, in the aggregate, any significant impact to either local or regional employment or sales. See Appendix 13 for a detailed discussion of the methodology involved in estimating the indirect or secondary economic effects.

The detailed methodology used for estimating the economic impacts to the ranchers is presented in Appendix 10.

III. AFFECTED ENVIRONMENT

III. AFFECTED ENVIRONMENT

OVERVIEW

The Missouri River has long served as an access route to Montana and the West. Although the river still receives limited use for transportation, it is primarily a recreational waterway. The "breaks", erosional interruptions in the river's escarpment, once supported primitive man and a diversity of animals. Today man is still on the scene, but many wildlife species, including plains grizzlies, bison, Audubon bighorn sheep, and wolves have vanished from the breaks.

CMR embraces 1,094,301 acres of land and water and stretches 125 miles from the Fort Peck Dam west along the reservoir and Missouri River in northeastern Montana (Table 4). The U.S. Corps of Engineers has primary jurisdiction of 588,464 acres, including the 249,000 acre Fort Peck Reservoir. FWS has secondary jurisdiction for wildlife management purposes over most of the remaining upland acreage. Private individuals own about 51,000 acres, and the State of Montana owns about 35,000 acres within the CMR boundary. These inholdings are scattered and vary in size from 40 to almost 5,000 acres.

Table 4. Land and water acreages within the Charles M. Russell National Wildlife Refuge, Montana.

Area	Acres
Fort Peck Reservoir (at maximum operating pool)	249,000
Federal lands	760,000
State lands	35,645
Private lands	49,656
Total land and water acres	1,094,301

The area now known as CMR was originally withdrawn from the public domain by President Franklin D. Roosevelt under Executive Order 7509 in 1936; initially, it was called the Fort Peck Game Range. As outlined in the Executive Order, the primary purpose of the range was:

> "...for the conservation and development of natural wildlife resources and for the protection and improvement of public grazing lands and natural forage resources...natural forage resources therein shall be first utilized for the purpose of sustaining in a healthy condition a

> maximum of four hundred thousand (400,000) sharp-tail grouse, and one thousand five hundred (1,500) antelope, the primary species and such nonpredatory secondary species in such numbers as may be necessary to maintain a balanced wildlife population... Provided further, that all the resources within this range or preserve shall be available, except as herein otherwise provided with respect to wildlife, for domestic livestock..."

In 1963, the Fort Peck Game Range was redesignated the Charles M. Russell National Wildlife Range by Public Land Order 2951, in honor of Montana's great cowboy artist. With renaming of the area, the Secretary of Interior reaffirmed the primary purpose and mission of CMR as a unit of the National Wildlife Refuge System, with primary responsi-bilities for administration of the area resting with FWS. BLM, however, continued to administer the livestock grazing program, subject to the program and policy requirements of FWS. On 27 February 1976, the administrative status of CMR and all other game ranges in the nation was again changed by the signing of Public Law 94-223. This brought to a close the joint management between BLM and FWS. Public Land Order 5635 (1978) changed the name of the game range to Charles M. Russell National Wildlife Refuge (Table 5).

Although Public Law 94-223 vested management authority of CMR with FWS, BLM still retains management authority over the Upper Missouri National Wild and Scenic River, part of which flows through CMR, as provided by Public Law 94-486.

Complex legislation and mandates exist between FWS and COE. A Memorandum of Agreement (Appendix 3) has been signed by both agencies and is guiding current management of the area. About 8,190 acres are occupied by supporting facilities such as powerhouses, dam, townsite, and maintenance areas. Special public use areas have been identified by COE for development of water-based recreation at 16 locations. Three areas are presently leased by MDFWP as state parks. The Bureau of Reclamation is responsible for power distribution.

Among other agency-management authorities on CMR is MDFWP. The department, together with FWS, manages resident game and fish. State school lands within CMR, generally located in sections 16 and 36, are administered by MDSL. Status of these lands is similar in many respects to that of private inholdings. NPS has responsibilities relating to cultural resources.

Table 5. Major documents affecting the Charles M. Russell National Wildlife Refuge, Montana.

Document name	No.	Date	Subject
Executive Order	6491	12/12/33	Ft Peck Dam (COE)
" "	6707	05/09/34	" " " "
" "	6841	11/09/34	" " " "
" "	7331	04/03/36	" " " "
" "	7509	12/11/36	Ft Peck Game Range
" "	9132	04/13/42	Ft Peck Dam (COE)
Secretarial Order	2843	11/17/59	Transfer jurisdiction
Public Land Order	2951	02/25/63	Name change (FWS)
" " "	4588	03/25/69	UL Bend National Wildlife Refuge (FWS)
Public Law	94-223	02/27/76	FWS sole administrator of the Wildlife Range
Public Land Order	5635	04/25/78	Name change to Refuge (FWS)

Construction and maintenance facilities for U.S. Highway 191 on the west side of CMR and State Highway 24 near Fort Peck on the east are administered by the Montana State Highway Department. Certain aspects of livestock grazing within CMR, such as the control of disease outbreaks and branding of cattle, are managed by the Montana Livestock Board.

The special mission of the National Wildlife Refuge System of which CMR is a part is to provide, manage, and safeguard a national network of lands and waters sufficient in size, diversity, and location to make available now and in the future public benefits associated with wildlife over which the federal government has responsibility, particularly migratory birds and endangered species (Fish and Wildlife Service 1979).

The broad objectives of the National Wildlife Refuge System are to:

1) Preserve, restore, and enhance in their natural ecosystems all species of animals and plants that are endangered or threatened with becoming endangered on lands of the National Wildlife Refuge System.

2) Perpetuate the migratory bird resource for the benefit of people.

3) Preserve the natural diversity and abundance of mammals and nonmigratory birds on refuge lands.

4) Provide understanding and appreciation of fish and wildlife ecology and man's role in his environment and provide visitors at service installations with high quality, safe, wholesome, and enjoyable recreational experiences oriented toward wildlife.

CLIMATE

The climate of the CMR region is typical of the high plains in North American with moderately cold winters (average January minimums near 0 degrees F) having occasional cold periods exceeding -20 degrees F. Summers are generally pleasant (averaging in the 80's during afternoon hours) with occasional hot periods exceeding 100 degrees F. Low humidity, high temperatures, and moderate to strong winds cause rapid loss of soil moisture. Mean annual precipitation is 12-13 inches with about 70 percent occurring from April-September. Due to the dominantly heavy-textured soils, runoff is rapid, often exceeding 50 percent of the total precipitation. The average frost-free period is about 120 days. CMR is also subject to intense lightning storms from late July to early September, often resulting in wildfires.

GEOLOGY

The Missouri and Musselshell rivers flow through deep valleys with narrow flood plains lying 500-1,000 feet below the average elevation of surrounding uplands. Elevations vary from slightly over 2,000 feet above mean sea level near Fort Peck Dam to over 3,200 feet in the Seven Blackfoot area. Three main landforms---uplands, breaks and floodplains--- dominate CMR and surrounding area. Uplands are level-to-rolling prairies dissected by intermittent streams flowing toward the Missouri River in a generally eastward direction. These are the sagebrush-grassland plains typical of eastern Montana.

The breaks lying adjacent to the Missouri River are typified by dissected, rough terrain often culminating in spectacular badlands. This topography is common to a strip of land 2-10 miles wide along the Missouri River and varies from low, barren hills of the Big Dry area south of Fort Peck to severely eroded coulees of the Seven Blackfoot and Burnt Lodge areas and the juniper, pine, and grassland ridges on the western half of CMR. Approximately 40-50 percent of lands within CMR consists of steep ridges and eroded coulees.

Flood plains occur along the Missouri and Musselshell rivers at upper extremities of Fort Peck Reservoir and along some of the larger drainages. These developed from pre-glacial river and stream alluvium and are characterized by heavy clay soils, deciduous trees, sagebrush, and grassland. These flood plains are comparatively flat and vary in width from 25 yards to 2 miles.

The Judith River formation outcrops west of Rock Creek in Phillips County in major stream valleys. It is composed of several hundred feet of interbedded shale, siltstone, and sandstone with scattered beds of lignite and bentonite. This formation has good stability, but its outcrop area is limited to steep slopes.

Bearpaw shale underlies more of CMR than any other formation. The breaks west of UL Bend are almost entirely composed of this shale as are lower slopes east of UL Bend, except in the central and southern parts of Big Dry Arm. Bearpaw shale is almost entirely composed of dark gray, clayey shale and includes thin beds of bentonite. The predominant particle size of this formation is clay, and the predominant clay mineral found in Bearpaw shale is montmorillonite. As a result, this unit swells when exposed in steep slopes and erodes rapidly at many locations.

Fox Hills sandstone is composed of yellowish gray sandy shale, claystone, siltstone, and/or very fine-grain sandstone and grades upward into relatively thick beds of resistant fine and medium-grain yellowish brown sandstone. The formation is generally found in areas of high relief along Fort Peck Reservoir such as Larb Hills, Harper Ridge, and much of Garfield County. Along Big Dry Arm, Fox Hills sandstone is found south to Rock Creek (east).

The Hell Creek formation is generally found above 2,500 feet in elevation in the central and eastern parts of CMR. The formation is composed of unconsolidated fine sediments such as claystone, shale, siltstone, and sandstone. Some of the clay and silt-rich zones of the formation tend to shrink and swell during excavation or when exposed to water.

Fort Union formation is found in Garfield and McCone counties, east and west of Big Dry Arm and south of Rock Creek (east). The formation is also found in the highest parts of Larb Hills. Tullock member, most widely found subunit of the Fort Union formation of CMR, is light gray to dark gray shale alternating with sandy shale and gray to buff sandstones. Lignite beds are also found in association with this member. This formation responds similarly to the Hell Creek formation to most development activities.

Glacial till is found at scattered locations, particularly between Rock Creek (west), Phillips County, and Valentine Creek. This is dense, clayey material with characteristics similar to Bearpaw shale. Outwash and related deposits are found west of UL Bend on low benches and in the Missouri valley, in the lee of bedrock ridges. These latter deposits are porous and stable.

The historical rock record exposed on CMR dates to almost 80 million years bp (before present) or Late Cretaceous. Sedimentation dominated the area until about 58 million years bp. For the next 55 million years, sediments were successively eroded away as the plains and surrounding areas were sporadically uplifted. In the past 3 million years, glaciers advanced over the area, the most recent retreating northward about 20,000 years bp.

Ice jams cause the highest levels of flooding on major streams such as the Missouri River, Big Dry Creek, and Musselshell River. Snowmelt runoff causes the greatest flood flow volumes on these same streams. High flows can occur on these streams any time from January-August. Rainstorms cause major flooding on smaller drainages.

All stream channels flowing through unconsolidated material meander over time. The Missouri River upstream of Fort Peck Reservoir has shifted as much as 2,000 feet in about 65 years at average rates up to 30 feet/year. The Fort Peck Reservoir delta is the area of greatest channel change and sedimentation; other areas of channel change and bank erosion are found on most upstream portions of most stream bottoms.

Areas of current and past landslide activity cover about one-third of the surface area of CMR. Steeply sloping areas in the western Bearpaw breaks, Garfield County, Larb Hills, and Harper Ridge have the most significant number of landslides. Landslides are of several types; slump-earthflows are the most common. Rapidly moving debris flows also occur, especially in the western Bearpaw breaks.

Piping is an important erosional process in the Hell Creek formation and in landslide deposits. Pipes may collapse or create general ground instability. Areas of classic piping on CMR occur at Hell Creek, Big Dry Arm, and other locations.

Results of a mineral survey of CMR (Geological Survey 1979) indicate that parts of the area have a moderate potential for oil and gas, low to moderate potential for lightweight aggregate, bentonite, and coal, and low to nil potential for other mineral commodities such as uranium or gold. Oil accumulations probably lie at depths greater than 4,000 feet. The most likely area of accumulation underlies the western part of CMR.

There is a good possibility that the entire refuge is underlain by shallow natural gas deposits. Significant resources of this type are already being developed in the Bowdoin field and on flanks of the Bearpaw Mountains. The gas deposits, if present, would occur at depths of less than 2,000 feet.

Bentonite resources are estimated at about 4.3 billion tons. Highest quality bentonite beds are found in Bearpaw shale, particularly west of Nichols Coulee in the Siparyann bed. This bed ranges in thickness from 1-6 feet at the outcrop. Bentonite resources east of Nichols Coulee are considered of low potential because of thinness and poor quality. Bentonite on CMR is of unacceptable quality as drilling mud, but acceptable for the casting industry to bind molding sand and possibly by the taconite industry to bind finely ground iron ore into pellets.

Bearpaw shale has a moderate potential for use as lightweight aggregate. Shale sequences high in bentonite content are the most suitable. The refuge contains significant quantities of sand and gravel; one gravel pit is currently in use near Hell Creek.

CMR is estimated to contain over 290 million short tons of coal. Of this total, the Judith River formation may contain about 190 million short tons in beds averaging less than 2.5 feet in thickness and which contain about 40 percent ash. About 100 million short tons of coal are found in Hell Creek and Fort Union formations in beds ranging from 1-5 feet in thickness.

SOILS-WATER RESOURCES

Four major soils orders are represented on the refuge. They are Entisols (soils characterized by very limited development), Aridisols (well-developed soils formed in a dry environment), Mollisols (soils with surface layers (horizons) noticeably darkened by organic matter accumulations), and Vertisols (soils that have a self-plowing action because of high shrink-swell rates associated with varying moisture levels).

Mollisols are prairie soils generally found in areas of higher rainfall than found on the refuge; their extent is very limited here.

Aridisols present on CMR are composed of two types or suborders: those characterized by salt and clay accumulations below the surface, resulting in a relatively impervious subsoil, and those with no significant salt or clay accumulations. These latter types represent the most significant agricultural potential of any soils present because of their fertility and areal extent. They are found on the more gentle slopes of CMR. Garfield and McCone counties most typically contain these soils, which are generally derived from sandstone or alluvium in sedimentary uplands.

Entisols are typically found on the breaks portion of CMR. The vegetated surface is quite unstable on these steeply sloping breaks, and soils are poorly developed. Other Entisols include those present on flood plains of rivers and major creeks in the area. Parent materials (unconsolidated minerals or organic matter from which soils are derived) for these Entisols include alluvial deposits laid down by streams or sedimentary deposits (siltstone, sandstone, or clay from Bearpaw shale).

Vertisols are most commonly associated with the very fine-textured Bearpaw shales and are generally located north of the Missouri River. They are typically found on strongly sloping sedimentary (Bearpaw shale) uplands or as fans or terraces formed below the Bearpaw shale.

In addition to topographic features which affect soils, as described previously, geologic formations such as Bearpaw shales or glacially derived deposits have a definite effect on soils and soil-forming processes. Bearpaw shales and glacial till deposits occur mainly north of the Missouri River on the east side of the Musselshell River and on both sides of the Missouri to the west of the Musselshell River. Soils in Garfield and McCone counties are more commonly derived from sandstone deposits or are formed as alluvial deposits from sedimentary uplands.

Concerning limitations of those soils present, Aridisols and Mollisols are generally amenable to cultivation and respond well to good management practices. Vertisols and Entisols are generally unsuited to agriculture because of their salt content, low productivity, and topographic features which are generally accompanied by high erosion hazards. Several thousand acres of depauperate, heavy clay or salt-affected soils exist on CMR. These soils have low water infiltration rates. Precipitation on such sites remains on the surface until it evaporates. The soil may be completely dry at depths of 6-8 inches below the surface. Range sites associated with such soils are referred to as dense clays or panspots.

Soils or land forms present in Class VIII capability (Appendix 7) are considered suitable only for recreation, wildlife, or watershed uses. Many of these mapping units represent parent materials rather than soils. Decomposing sandstone outcrops, Bearpaw shale, beach sand, and badlands are included in this category.

Soils and weathered bedrock on CMR tend to be moderately to highly expansive. Not only do these soils swell when wetted, but they also heave when excavations are made.

According to Schmidt (1979), erosion rates on the refuge are high. Stock ponds have an average life of about 10 years. The range for sediment accumulation in stock ponds in Bearpaw shale drainages (Willow Creek) is presently from 0.1-5.3 acre-feet/sq. mile/year. Schmidt stated that yields in other steeply sloping Bearpaw breaks may be as high as 10 acre-feet/sq. mile/year. The larger figures are as high as those measured anywhere in the semi-arid West. He indicated that the distinction between natural (geologic) erosion and accelerated (man-caused) erosion is not clear. He did state that the occurrence of trenched valley fills extending into headwaters, however, presents the likelihood that erosion rates were much less in previous times, perhaps prior to large scale grazing in the late 1800's.

Schmidt stated that estimates of bare ground percentages correlate more closely with erosion intensity than any other factor identified in the literature. Estimates of 340 samples on the refuge revealed average ranges of from 15-42 percent bare ground for the potentially best range sites.

Since many of the access roads on the refuge are built on gumbolike Bearpaw shale, any measurable precipitation, together with motorized use of these roads, is enough to turn them into impassable quagmires. Ruts created by vehicles during wet weather often do not heal from one year to the next. These ruts then provide channels for water runoff during subsequent rainfall, often leading to complete deterioration of the road and ultimately necessitating complete regrading of the road system.

The most conspicuous water areas on CMR are Fort Peck Reservoir and the Missouri River. The reservoir and river occupy approximately 249,000 acres, over 18 million acre-feet of water, when the reservoir is at peak storage capacity, maximum pool level of 2,250 feet above msl. CMR embraces 35 miles of free-flowing Missouri River upstream of the Fort Peck Dam and only one mile below it. The reservoir extends approximately 90 miles from east to west. Sediment loads in all streams are high as a result of the extremely erosive soils on CMR.

Ground water is relatively deep in the breaks area and domestic wells generally vary from 300-1,200 feet in depth (Table 6). Artesian wells can be developed over much of CMR by drilling to the Judith River formation. Best quality water is found in wells drilled in the alluvium along the Missouri River valley. Good quality water can also be found in the Fox Hills-Hell Creek aquifer in Garfield and McCone counties and on Harper Ridge where springs are numerous.

Table 6. Groundwater sources on Charles M. Russell National Wildlife Refuge, Montana.

Source	Water Development Potential
Judith River formation	Very good
Bearpaw shale	None
Fox Hills sandstone	Good in upper part where topography not greatly dissected
Hell Creek formation	Good in lower part where topography not greatly dissected
Fort Union formation	Poor
Glacial deposits	Poor
Alluvium	Fair-good

Annual runoff for CMR is estimated to range from 0.02-0.04 cubic feet/second (cfs)/sq. mile/year or 14-29 acre-feet/sq. mile/year. Average discharge of the Missouri River is 9,288 cfs/year or 0.23 cfs/sq.mile/year. However, average discharge is experienced only about 13 percent of the time. Flows as low as 0.5 times the mean annual flow occur about 3 percent of the time, and flows as great as 1.5 times the mean annual flow occur about 7 percent of the time (Bureau of Land Management 1979).

Past livestock management practices have resulted in development of small stock ponds and wells within CMR. These stock ponds are normally less than one acre in size and are located near heads of small coulees. As discussed earlier, most ponds fill with silt and a few dams occasionally fail during heavy runoff.

WILDLIFE HABITAT-RANGE RESOURCES

Wildlife habitat was evaluated for representative species during the summer of 1978 on five major vegetative types (Appendix 2). The largest type is the sagebrush-greasewood-grassland, which occupies 61.4 percent of the area and includes four subtypes: big sage-grasslands, silver sage-bottomlands-sandy uplands, greasewood-grasslands-bottomlands and shadscale-barren areas (Figure 2). Big sagebrush and greasewood are the predominant shrubs, with species such as saltbush, silver sage, rubber rabbitbrush, and skunkbrush also present. Important grasses are western wheatgrass, needle and thread, green needlegrass, bluegrama, Junegrass, Sandberg bluegrass, plains muhly, and bluebunch wheatgrass. The condition of big sagebrush and associated shrub and grass species is limiting to all wildlife species sampled in this type (Appendix 2).

The ponderosa pine-juniper type occurs on 35.5 percent of CMR and includes three subtypes: ponderosa pine, Douglas fir, and juniper. Four coniferous tree species are indigenous: ponderosa pine, Douglas fir, limber pine, and Rocky Mountain juniper. Forest communities are found on some of the poorer soils. Trees are apparently prevented from occupying better sites by competition with grasses for low soil moisture (Prodgers 1979).

Other major types are grassland-deciduous shrub, riparian-deciduous riverbottoms (including ash coulees), and cultivated lands (hayland and dryland).

Trees, shrubs, and grasses are generally inadequate for various wildlife species. Security cover for elk is lacking from Timber creek to Fort Peck (Campbell 1979). The interaction of gentle topography, roads, and sparse conifer cover creates security cover problems. Mule deer require better interspersion of trees, sage, and grasses as well as more suitable shrubs (big sagebrush, skunkbrush, chokecherry, snowberry, rose, serviceberry, and rubber rabbitbrush) and forbs for food. Sharp-tailed grouse need 2-3 inches more residual cover (8-10 total) and better developed shrub communities (buffaloberry, chokecherry, rose, and snowberry) for food and cover. Mountain bluebirds require more nesting cavities. Porcupines need denser ground cover and more denning sites.

The grassland-deciduous shrub community is found in limited areas and comprises only 1.8 percent of the land base. It includes shrub communities of high importance to wildlife, especially sharp-tailed grouse. In those areas where grassland predominates, the key species are perennial grasses such as bluebunch wheatgrass, western wheatgrass, and green needlegrass. Prairie forbs include sagewort, wild licorice, sunflower, dandelion, yellow sweet clover, vetch, phlox, and prairie thermopsis, plus many others. Arkansas rose, common snowberry, chokecherry, western serviceberry, and buffaloberry are important shrub components of this type. Shrub parameters are better in this type than in any other type, but are still inadequate for wildlife (Appendix 2).

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CHARLES M. RUSSELL NATIONAL WILDLIFE REFUGE ENVIRONMENTAL STATEMENT

VEGETATION TYPES

LEGEND

VEGETATION TYPES

PONDEROSA PINE - JUNIPER

(A) Juniper
(B) Ponderosa Pine - Juniper

SAGE - GREASEWOOD - GRASSLAND

(A) Sage - Grasslands
(B) Greasewood - Grasslands
Deciduous Shrub - Grasslands
River Bottoms

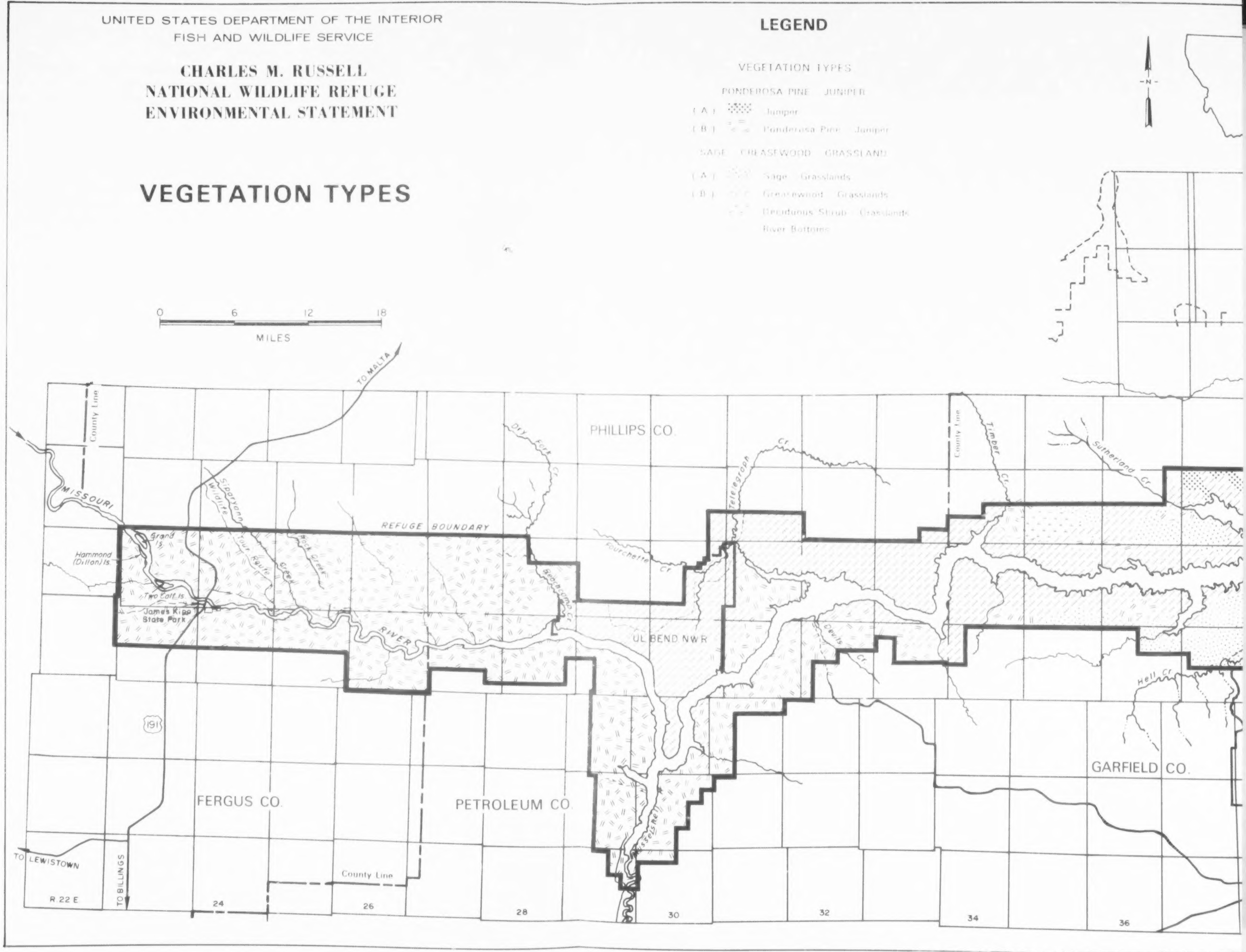
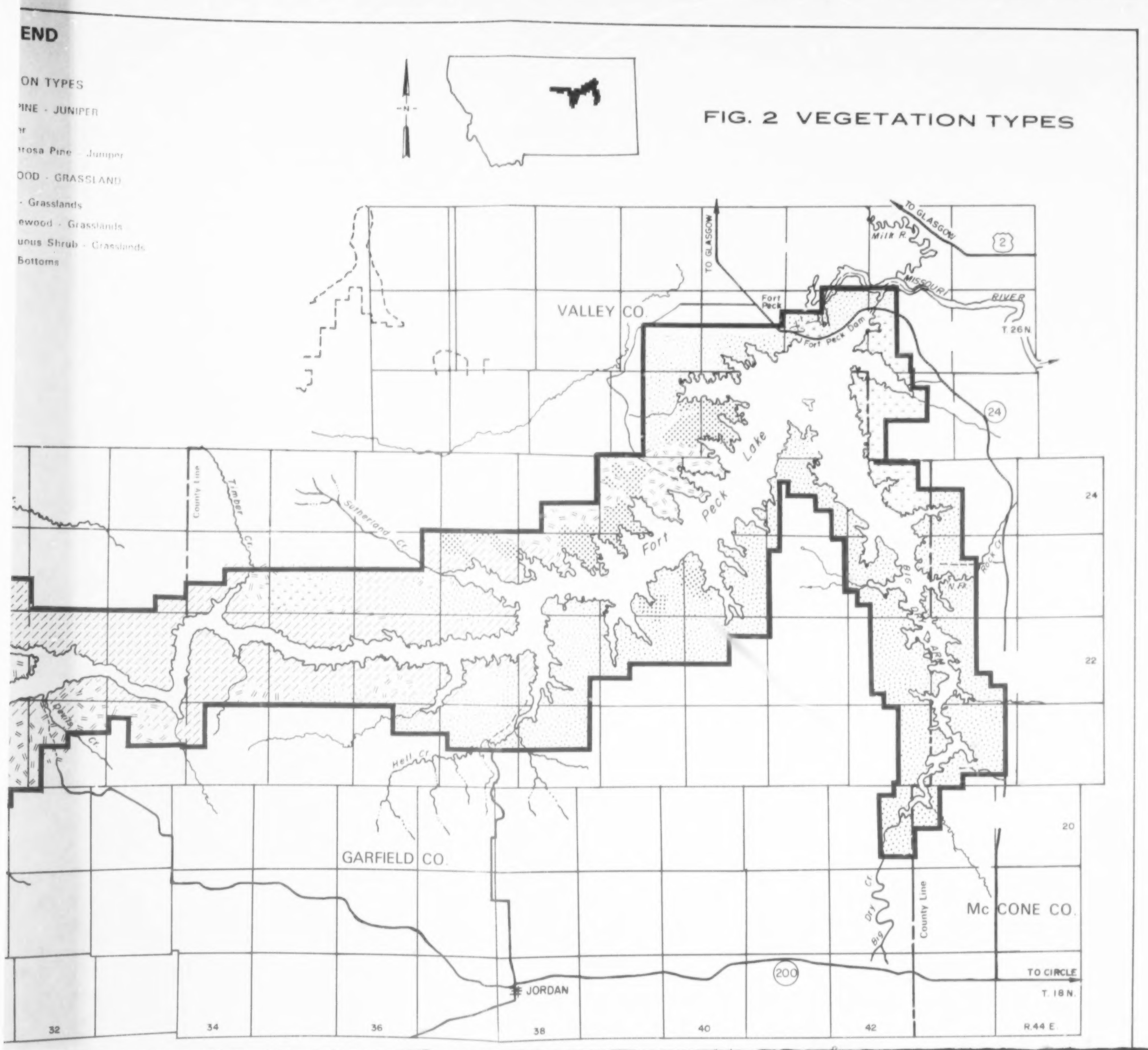


FIG. 2 VEGETATION TYPES



The riparian community comprises only 0.7 percent of the area. The major portion of this most productive and important wildlife habitat on CMR was permanently destroyed when Fort Peck Reservoir was filled in the 1940's. Approximately 35 miles of free-flowing river and associated habitat still remain on the western portion, subject to flooding and numerous ice jams. This flooding causes a change in wildlife habitat and associated wildlife-related recreation opportunities.

Woody plants in the riparian community include four species of cottonwood, four species of willow, green ash, box elder, and several shrubs also found in the grassland-deciduous shrub type. There are also several small stands of quaking aspen in this type.

Cultivated lands make up 0.6 percent of the area and occur primarily in the river bottoms in the west half of the refuge and on the uplands in the east half of the refuge. Cultivated lands are a mixture of small grains (barley and wheat), alfalfa, and wild hay. Cultivated lands are considered a major type in this analysis.

Wildlife habitat in riparian and cultivated types rated higher than all other types. Habitat quality for white-tailed deer in these areas rated low because browse was limited on minor continuous streams across the refuge.

A variety of other small habitats is represented within and adjacent to the major vegetative areas. Some of these are canyons, bluffs or rock outcrops, and ponds, all of which sustain or contribute to a variety of plant and animal communities. Pond development is not extensive, and the ponds present are in poor condition for wildlife due to lack of emergent vegetation and inferior upland vegetation.

A range survey was conducted on the refuge in 1978 (Fish and Wildlife service 1979) in accordance with the Soil Conservation Service (SCS) National Range Handbook. Range sites were identified on the basis of soil mapping units, precipitation, and geology (Appendix 8). Most common sites included overflow, sandy, silty, clayey, thin hilly, shallow clay, panspots, dense clay, thin breaks, saline upland, shale, and badlands. The less common sites included saline lowlands, sands, shallow-to-gravel, shallow, and very shallow. The methodology used in the survey is described in Appendix 8.

After a range site was identified, the plant species present were compared with the range site guide criteria for the site at climax to obtain range condition. Range condition is the amount of deviation from the natural potential or climax. Range condition categories are poor (0-25 percent of climax), fair (26-50 percent of climax), good (51-75 percent of climax) and excellent (76-100 percent of climax).

Overall results of range conditions found on grazing allotments subjected to livestock grazing are excellent,18 percent; good, 74 percent; fair, 7 percent; and poor, 1 percent (Appendix 9).

The survey revealed that range conditions for unallotted portions of CMR (no livestock) are predominantly excellent, and areas inaccessible to livestock by reason of topography or remoteness from water are excellent. Areas in fair or good condition are considerably more accessible to livestock. Poor range conditions are typically associated with prairie dog towns; locations of prairie dog towns have high correlations with past disturbances such as corrals, stock ponds, overgrazed areas, or former homesteads and are probably indicators of past use rather than causes of current conditions (C. Knowles personal communication).

On CMR, 10 permittees graze 48 percent of the total active federal AUMs, and 48 permittees graze 400 AUMs or less (Appendix 10). Fifteen of the 87 operators are dependent on refuge lands for more than 30 percent of their annual AUM requirements, and 10 operators fulfill 20-30 percent of their annual needs from refuge lands. The remaining 62 operators derive less than 20 percent of their annual forage requirements from CMR.

One of the problems identified during the planning process has been the season of livestock grazing use allowed on the refuge. In the past, grazing seasons have been established more to reflect the needs of operators than to protect natural resources.

Currently, 6 allotments use rest-rotation systems, 3 use deferred rotation systems, 15 have authorized use which encompasses year-long grazing on a portion or all of the allotment, and 43 allotments have seasonal grazing (generally spring through fall).

Livestock allotment boundaries are generally fenced on east and west boundaries or have physical barriers which preclude livestock movements between allotments. Allotment boundaries generally extend north or south off the refuge. The typical situation is that adjoining lands off the refuge are included in common allotments with CMR lands with no boundary fence separating them.

WILDLIFE

At least 45 mammalian species inhabit CMR, ranging from shrews to Rocky Mountain elk and bison. However, the only bison maintained are in exhibition pastures at Lewistown and Fort Peck; a few stray onto the refuge from private ranches in Fergus and Garfield counties.

Mule deer exceed all other ungulate wildlife in numbers and distribution (Figure 3). In this area they are nonmigratory, using the same range the entire year although some local movement occurs with seasonal changes in food and range use habits. In the early 1970's, mule deer populations

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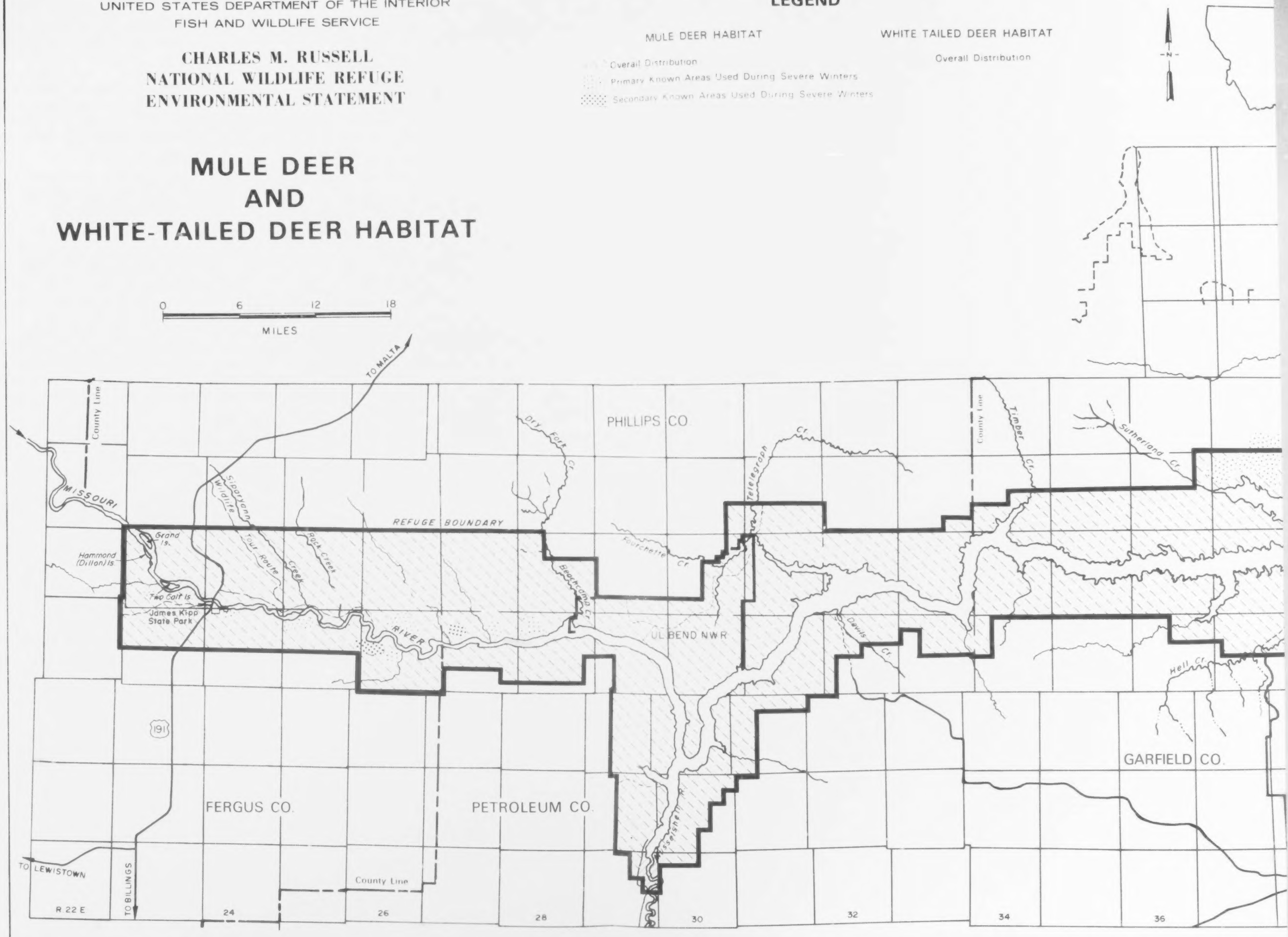
CHARLES M. RUSSELL
NATIONAL WILDLIFE REFUGE
ENVIRONMENTAL STATEMENT

MULE DEER AND WHITE-TAILED DEER HABITAT

LEGEND

MULE DEER HABITAT	WHITE TAILED DEER HABITAT
Overall Distribution	Overall Distribution
Primary Known Areas Used During Severe Winters	
▨ Secondary Known Areas Used During Severe Winters	



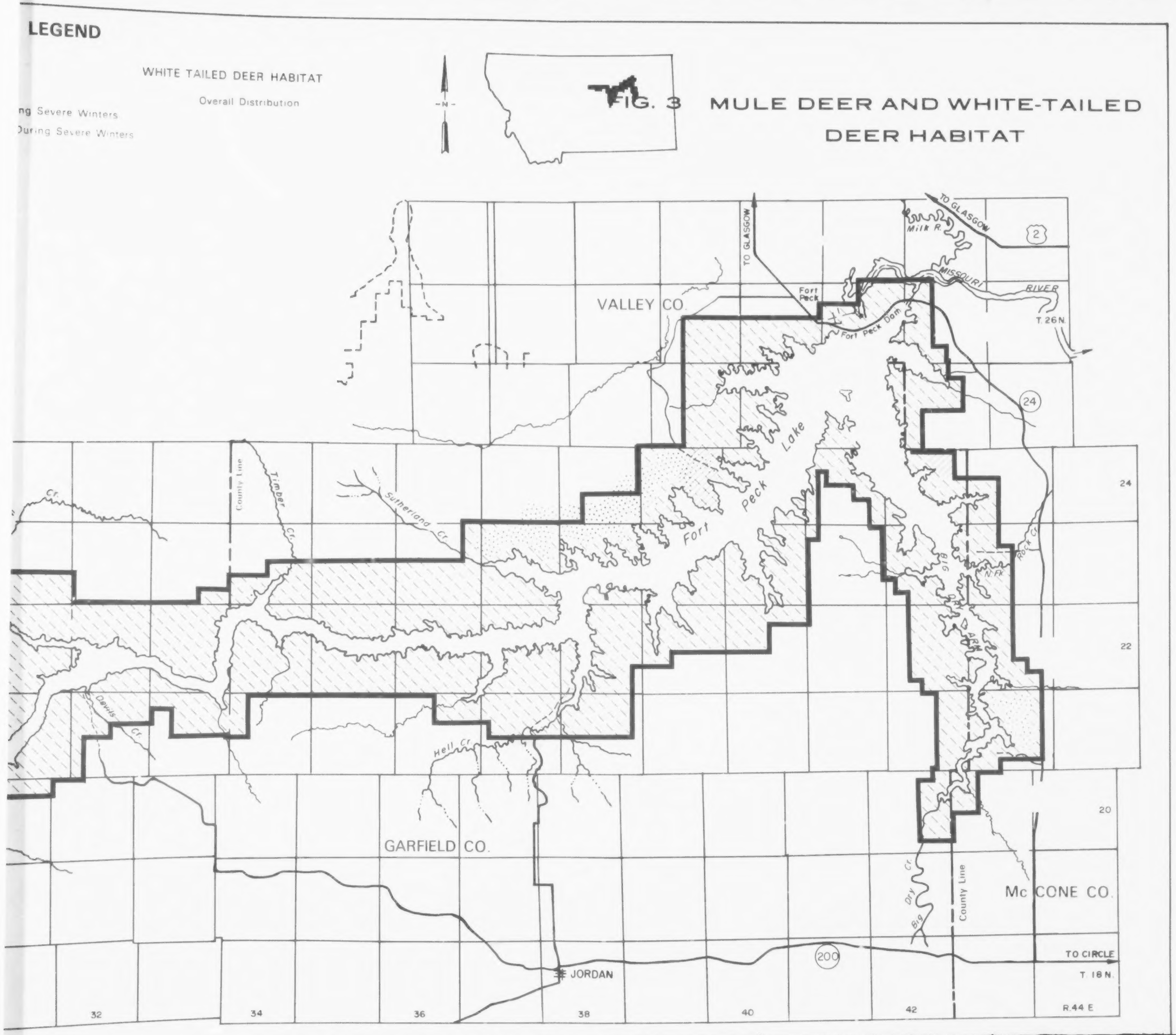


FIG. 3 MULE DEER AND WHITE-TAILED DEER HABITAT

dropped dramatically from 10-11 deer to 2-3 deer/sq. mile (Mackie 1976) and then stabilized; they now have increased to at least former numbers (MDFWP 1979).

Deciduous river bottoms of the Missouri and Musselshell rivers which have not been inundated by Fort Peck Reservoir are inhabited by white-tailed deer (Figure 3). Small numbers of white-tailed deer also occur along the reservoir near the Pines Recreation Area and the Fourchette-Telegraph Creek area.

The last native elk vanished from the breaks around the turn of the century. Eighty-one elk were successfully reintroduced in 1951 at three locations in Valley and Fergus counties. Another 49 elk were released at two locations in Phillips County a year later. Most are now found on the north side of the refuge in the breaks (Figure 4); however, some expansion of their range to areas south of the Missouri River in Fergus, Petroleum, and a portion of Garfield counties has occurred. Further expansion in these areas may add an additional 700-900 animals to the herd. Adjacent landowners' and grazing permittees' attitudes are negative toward this expansion, and poaching and illegal shooting could limit further expansion of their range. Crop depredations from elk occur on private land both within and adjacent to CMR in the northeast. The present elk population level in the breaks ecosystem (on and off the refuge) is approximately 1,300-1,500. CMR comprises only a portion of the herd's habitat. Elk do not recognize the refuge boundary and freely use habitat on either side.

Pronghorns occur sparingly within CMR since there is little suitable year-round habitat. However, during severe winter storms, pronghorns and mule deer move into the breaks for food and shelter. Concentration areas for the severe winters of 1977-78 are shown on Figure 5.

Sixteen Rocky Mountain bighorn sheep were released in 1947 along Billy Creek within a 328-acre fenced enclosure on range formerly occupied by Audubon bighorn sheep. In 1951, the herd had grown to 54. In 1952, the fence was removed, the animals dispersed and by 1963 the entire population had disappeared, apparently because of poaching, predation, disease, and competition with livestock. A second attempt to reestablish bighorns in the breaks was undertaken between 1958-1961. Forty-three sheep were stocked in a 2,200-acre exclosure near the west boundary of CMR (Figure 6). The population climbed to 80-100 animals by 1969. Then a series of circumstances, including severe winters and competition with livestock, decimated the population until only 10-15 animals remained. Twenty-seven Rocky Mountain bighorn sheep were released in the Mickey-Brandon buttes area on March 8, 1980. An aerial count in this area in 1984 revealed 70 sheep.

Black-tailed prairie dogs have been eliminated over much of their original range in the western United States. However, 121 widely scattered dog towns (Figure 7) occupying approximately 7,540 acres are present on CMR.

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**CHARLES M. RUSSELL
NATIONAL WILDLIFE REFUGE
ENVIRONMENTAL STATEMENT**

ELK HABITAT AND SHARP-TAILED GROUSE HABITAT

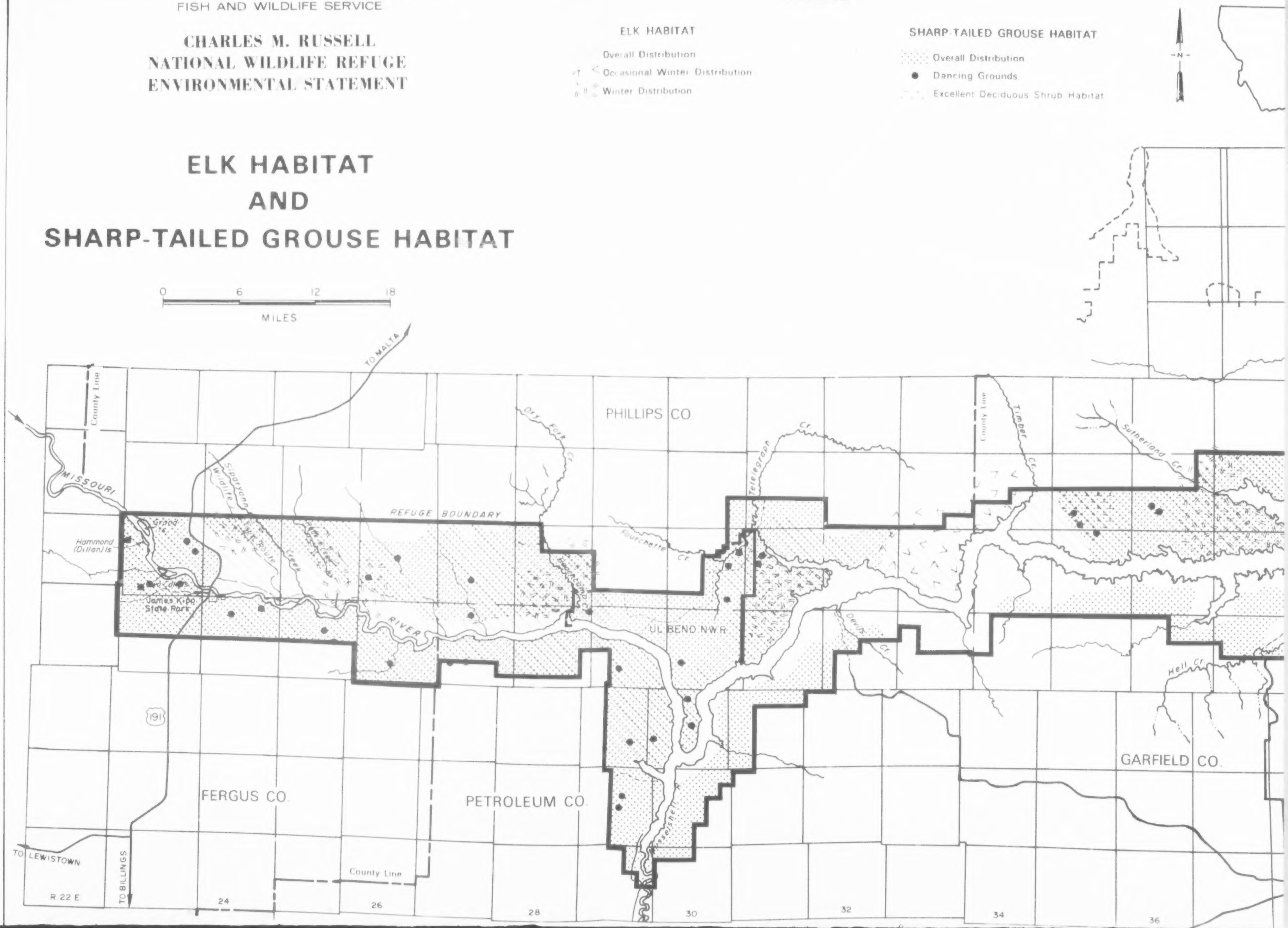
LEGEND

ELK HABITAT

Overall Distribution
Occasional Winter Distribution
Winter Distribution

SHARP-TAILED GROUSE HABITAT

Overall Distribution
● Dancing Grounds
Excellent Deciduous Shrub Habitat



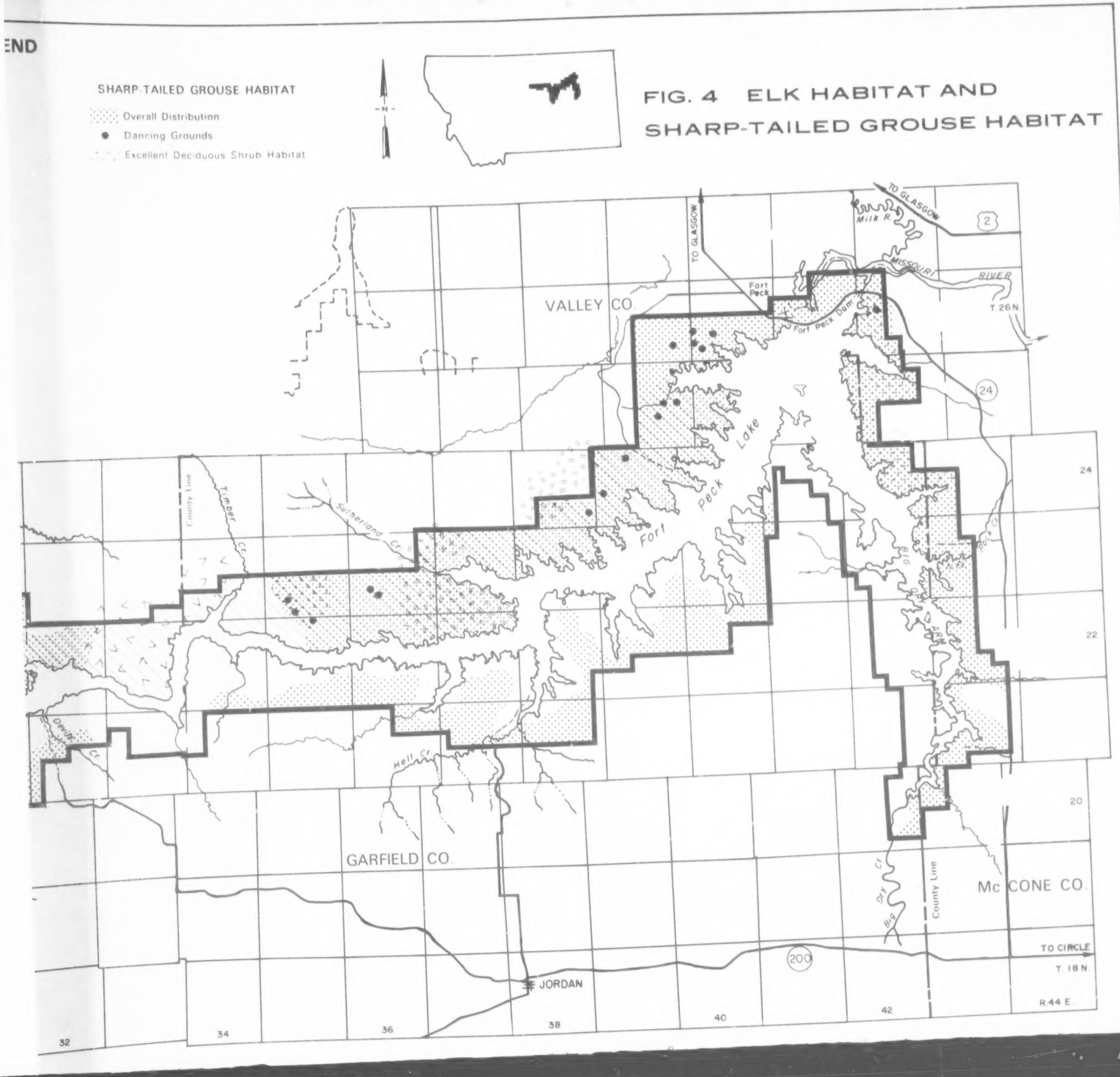


FIG. 4 ELK HABITAT AND SHARP-TAILED GROUSE HABITAT

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**CHARLES M. RUSSELL
NATIONAL WILDLIFE REFUGE
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PRONGHORN HABITAT AND SAGE GROUSE HABITAT

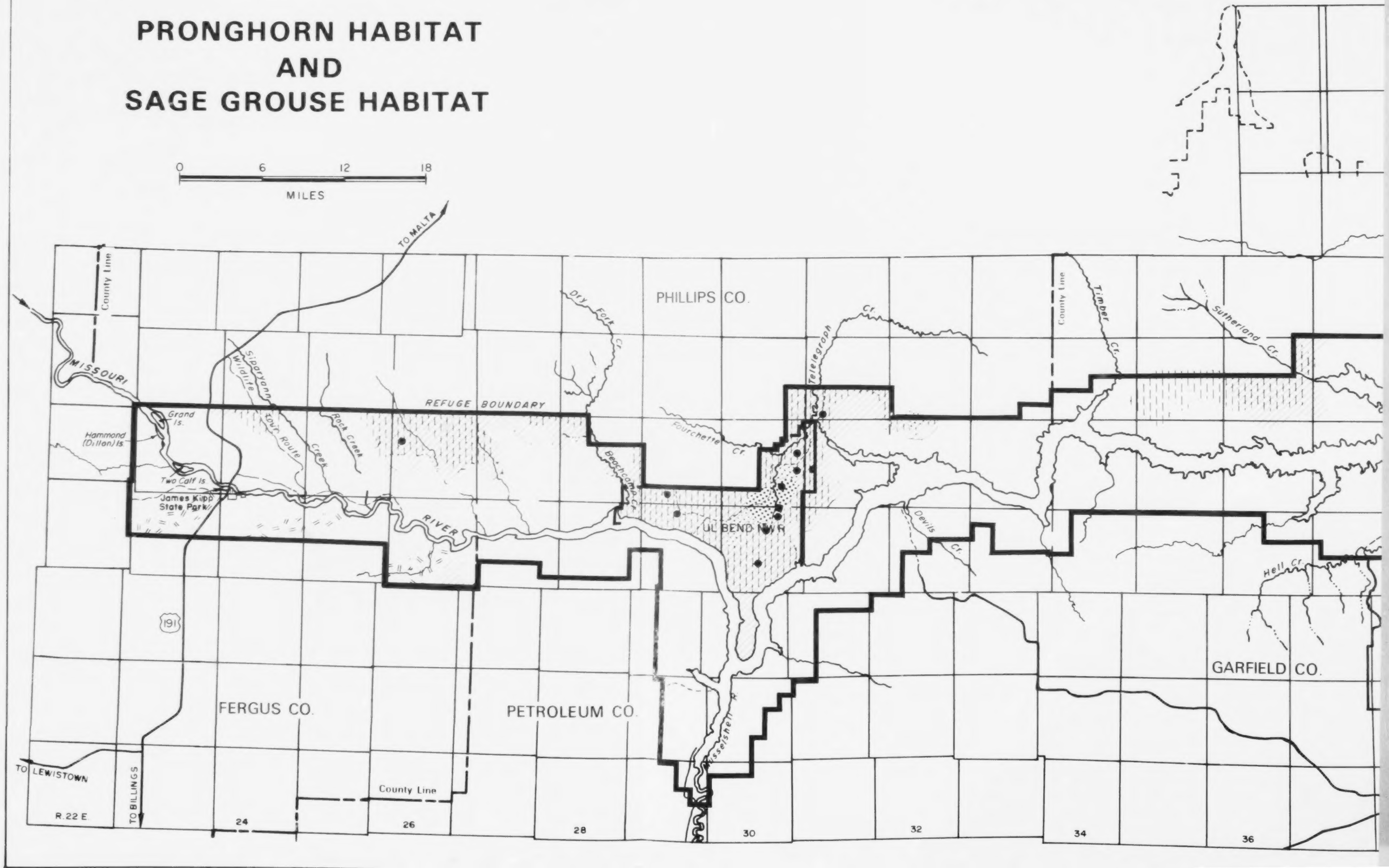
LEGEND

PRONGHORN HABITAT

- ⦙ Overall Distribution
- ░ Winter Distribution
- = Primary Known Areas Used During Severe Winters

SAGE GROUSE HABITAT

- ▨ Overall Distribution
- ▒ Winter Distribution
- = Primary Known Areas Used During Severe Winters
- ● Strutting Grounds



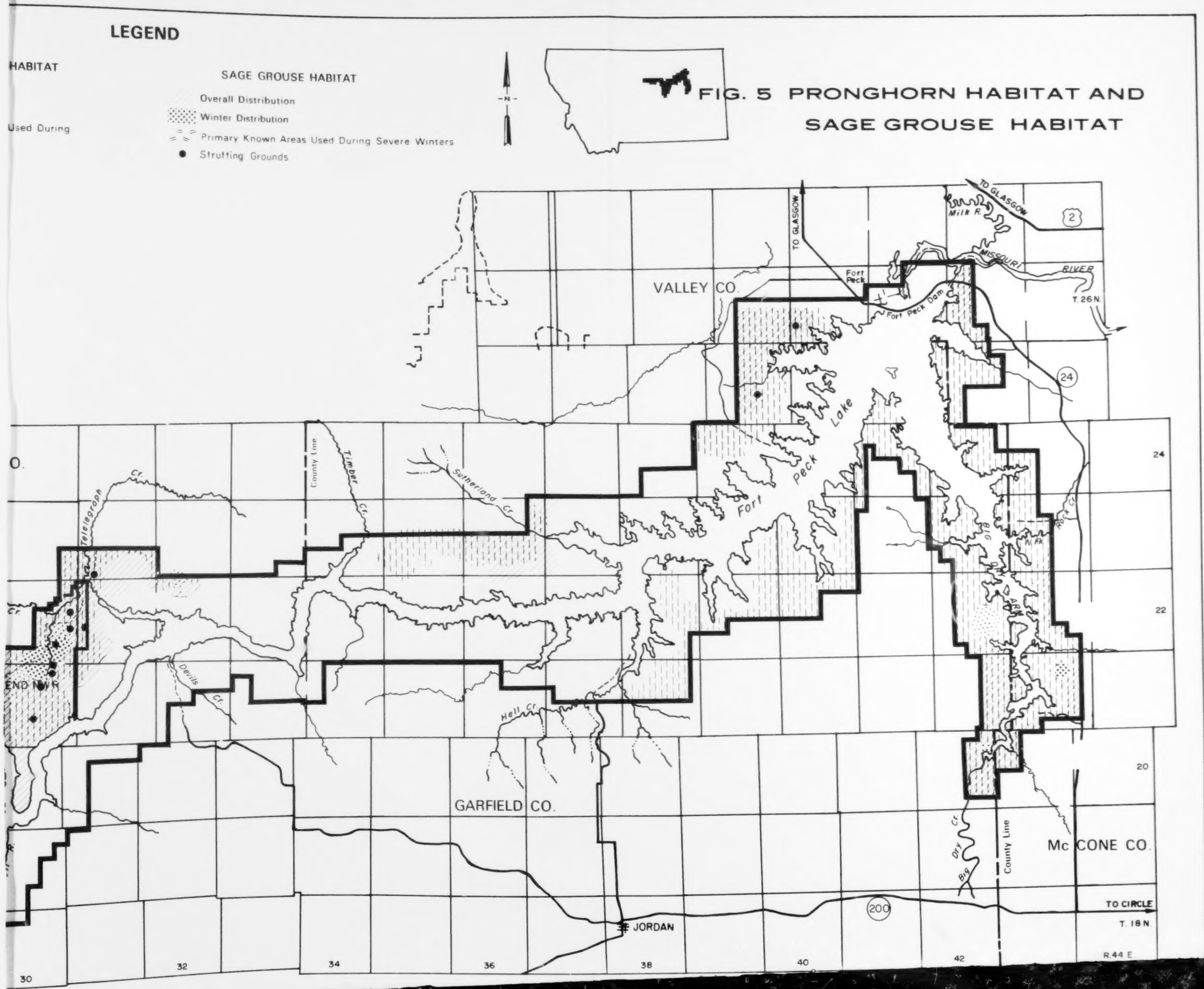


FIG. 5 PRONGHORN HABITAT AND SAGE GROUSE HABITAT

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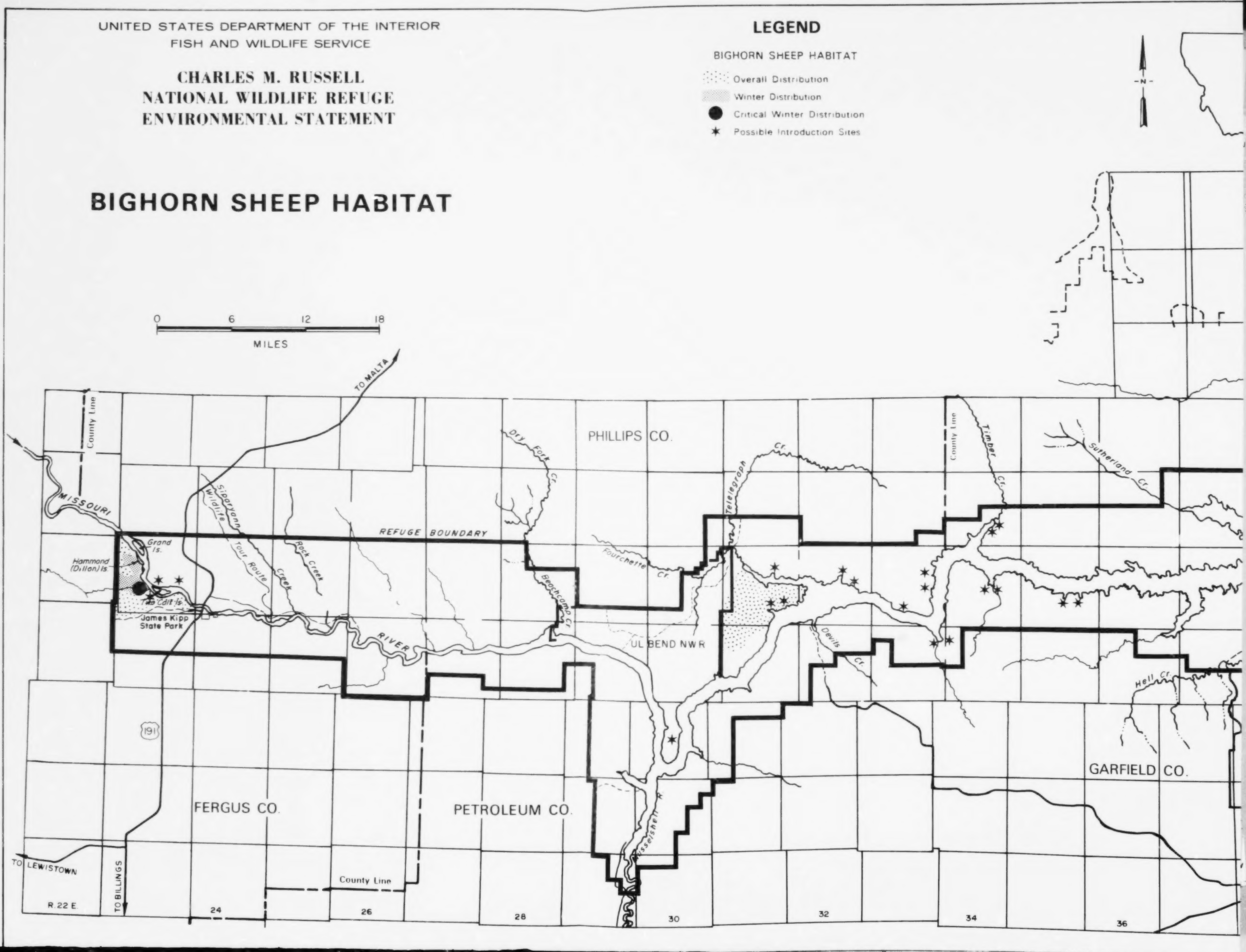
CHARLES M. RUSSELL
NATIONAL WILDLIFE REFUGE
ENVIRONMENTAL STATEMENT

BIGHORN SHEEP HABITAT



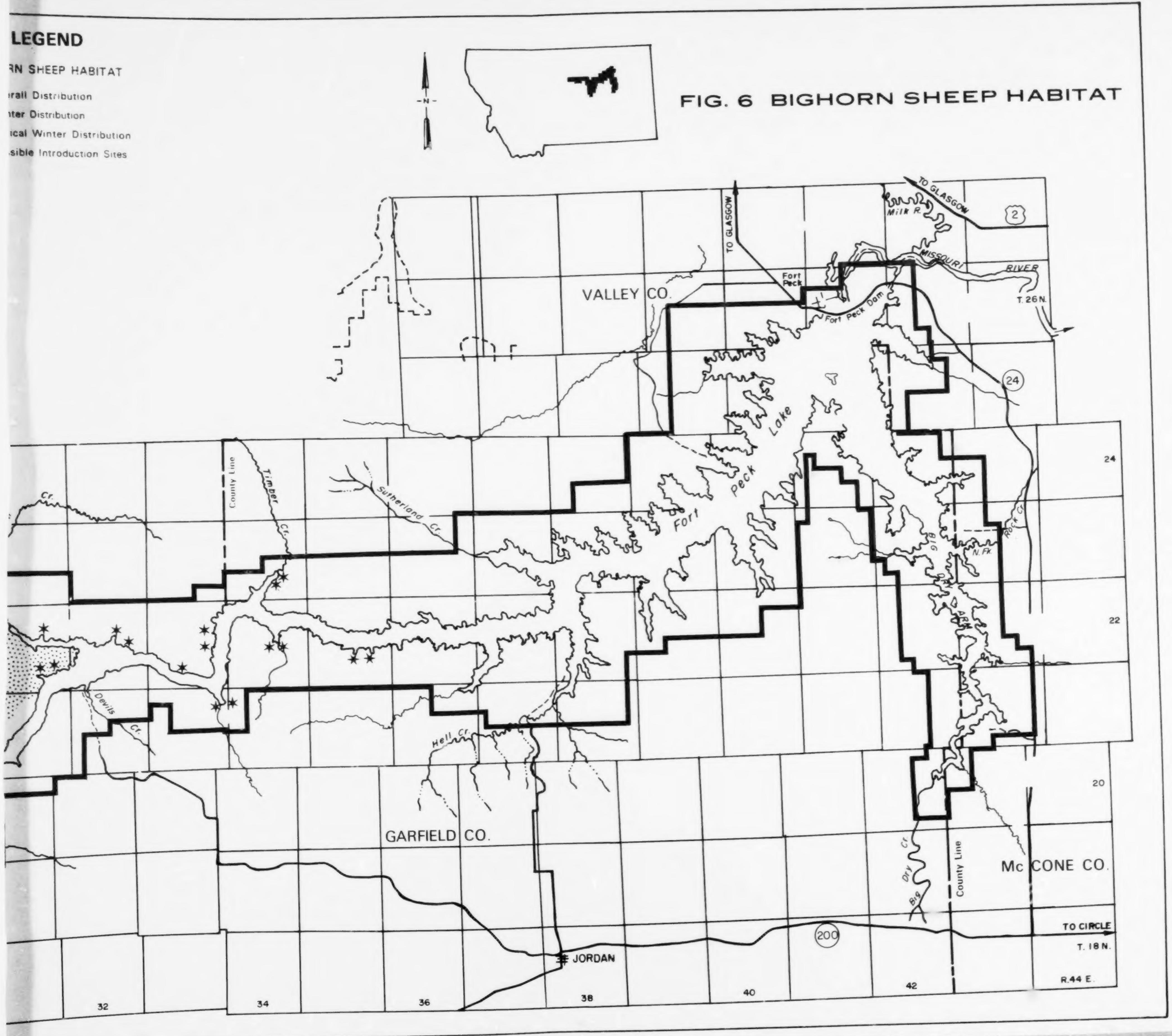


FIG. 6 BIGHORN SHEEP HABITAT

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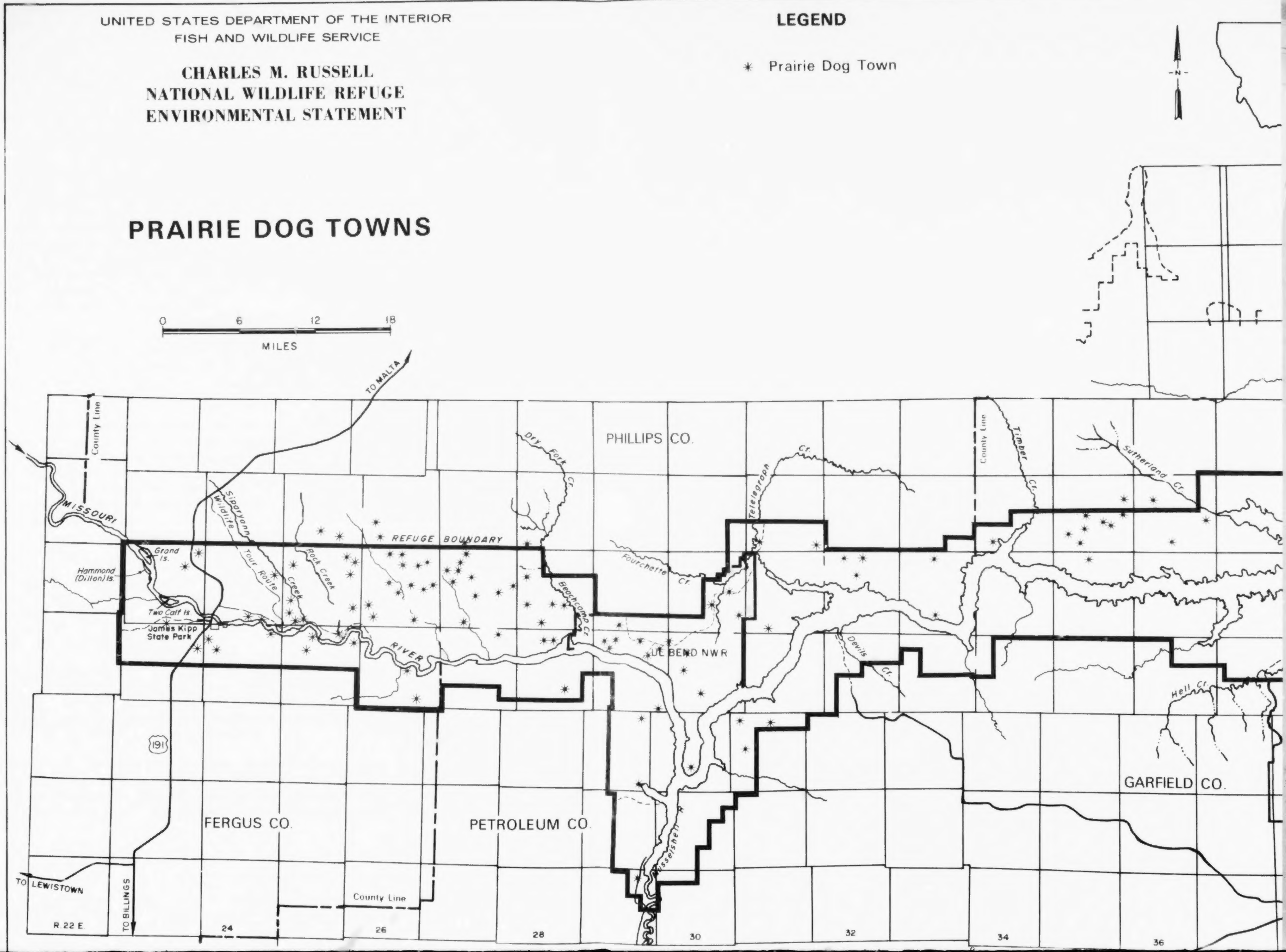
**CHARLES M. RUSSELL
NATIONAL WILDLIFE REFUGE
ENVIRONMENTAL STATEMENT**

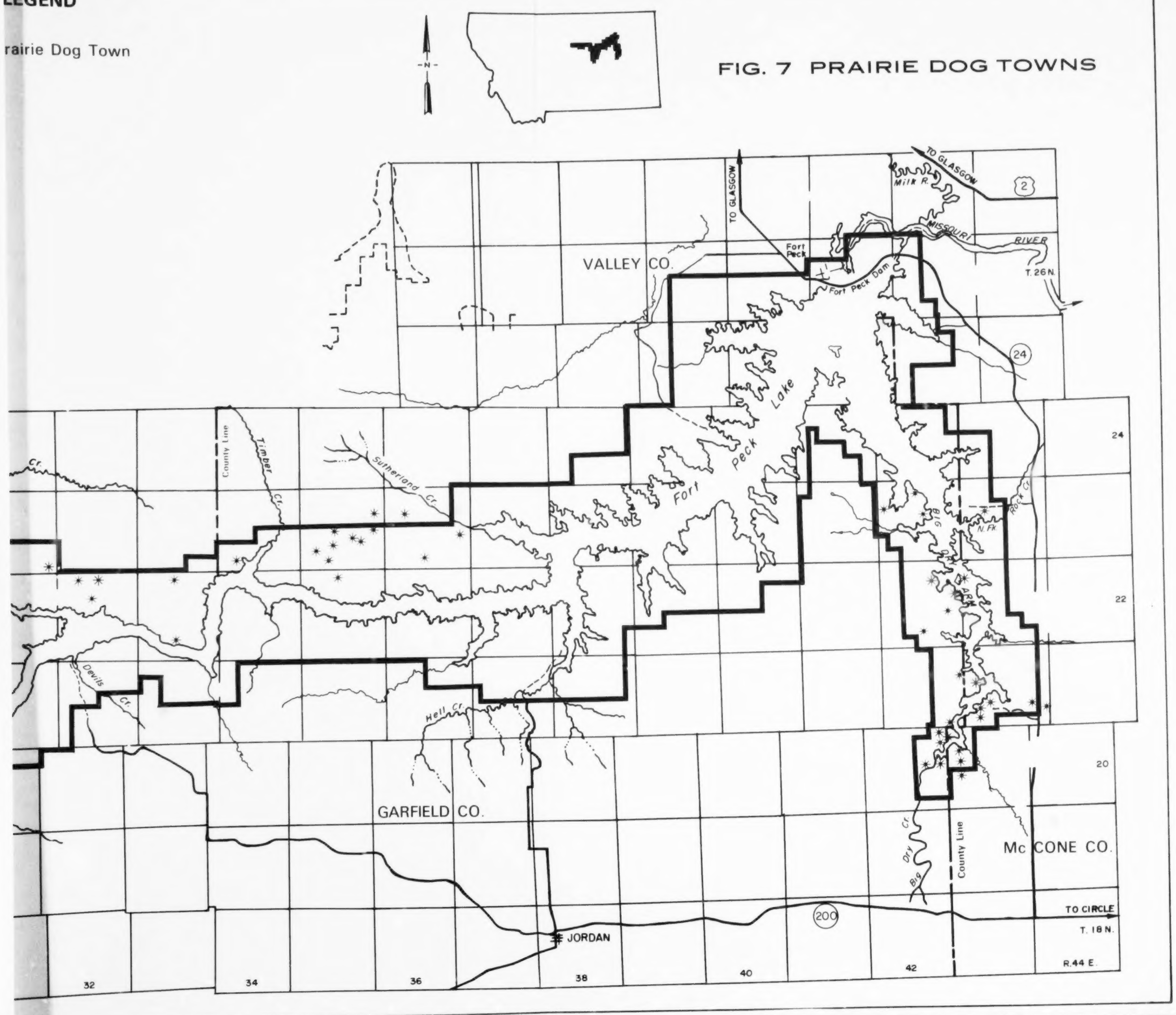
PRAIRIE DOG TOWNS



LEGEND

rairie Dog Town

FIG. 7 PRAIRIE DOG TOWNS



These towns provide all or partial habitat requirements for some 30 other species of wildlife.

The rugged breaks, benchlands, and flood plains combine to support a large variety of other mammals including bobcats, badgers, coyotes, striped skunks, white-tailed jackrabbits, mountain and desert cottontails, raccoons, porcupines, and numerous small rodent species. Beaver, mink, and muskrats occur along the river bottoms and, to a lesser degree, along the reservoir shoreline.

The diverse, avian habitat on the refuge attracts a large variety of birds. Over 245 species have been recorded, of which 15 percent are year-round residents. Upland sandpipers, mountain plovers, long-billed curlews, and burrowing owls are among the more unique birds which inhabit the grassy benchlands; burrowing owls and mountain plovers are also commonly associated with prairie dog towns.

Cottonwood trees partly inundated by the reservoir support nests of several pairs of osprey as well as rookeries of double-crested cormorants and great blue herons. Prairie falcons and golden eagles are common nesting residents on cliffs of the more rugged and inaccessible portions of the breaks.

Very little waterfowl production occurs on Fort Peck Reservoir; however, geese concentrate in the safety of several of the bays during their molting period, and small flocks of ducks over-winter below the dam most years. The largest numbers and varieties of waterfowl occur during fall migration when the birds utilize standing grain crops and marsh developments along the flood plain for feeding and staging. Limited waterfowl production occurs on upland ponds.

The most common upland game birds are sharp-tailed grouse. They occur across CMR in the ecotone between forest and prairie, with woody vegetation in the form of shrubs and trees considered an essential component of their habitat (Grange 1948). Population estimates for sharp-tailed grouse are speculative; one estimate of spring breeding bird densities is 5-10 birds/sq. mile (R. Watts personal communication). Known dancing grounds are shown on Figure 4.

Late summer concentrations of nearly 500,000 mourning doves have been observed near the Musselshell River bottoms and exposed weedy flats along the reservoir on the west side of CMR. Other upland game birds, including sage grouse, gray partridge, ring-necked pheasants, and Merriam's turkeys, occur in varying numbers and locations.

Many species of nongame birds occur seasonally on CMR. Birds considered common and very numerous at one or more seasons include red-tailed hawks, marsh hawks, common nighthawks, poorwills, eastern kingbirds, prairie horned larks, bank swallows, black-billed magpies, pinyon jays, American

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robins, mountain bluebirds, Bohemian waxwings, house sparrows, western meadowlarks, yellow-headed blackbirds, red-winged blackbirds, Brewer's blackbirds, lark buntings, American goldfinches, and chipping sparrows.

The CMR fishery resource is limited to Fort Peck Reservoir, the Dredge Cuts, the Missouri River above the reservoir and below the dam, Musselshell River, and stocked ponds (Alvord 1979). Common sport fish include northern pike, walleye, lake trout, shovelnose sturgeon, sauger, burbot, paddlefish, and channel catfish. Pallid sturgeon are present in small numbers and have been called a threatened species by the American Fisheries Society (Alvord 1979). They have not been so classified by the Secretary of the Interior. A commercial fishery exists on the reservoir involving goldeye, carp, river carpsucker, buffalo, and freshwater drum.

Fisheries management is confined primarily to stocking operations from state and federal hatcheries and enforcement of regulations. In addition, ongoing studies and research by MDFWP are defining requirements for paddlefish spawning; significant walleye spawning runs up Big Dry Creek have been documented (R. Johnson personal communication). The CMR fishery is limited by siltation of the lake and fluctuating water levels which makes establishment of littoral zone vegetation needed for spawning habitat almost impossible. This problem is compounded by Fort Peck being the first mainstream reservoir on the Missouri which makes it difficult to control water levels. Due to these limitations, there is little that can be done to improve the current fishery management program. Small intermittent and continuous streams may provide spawning and nursery habitat. However, no information is available on these streams.

Six species of amphibians and ten reptiles are known to occur in eastern Montana with ranges overlapping CMR. None of these species is endangered or threatened and none has commercial value.

Peregrine falcons often winter in the vicinity of Fort Peck where they prey on winter flocks of ducks and other birds. Occasional sightings have also been made at the west edge of CMR. Migrating bald eagles rest along the shoreline of Fort Peck Reservoir as well as along the Missouri River. One nest is thought to have been built in 1966 along Two Calf Creek where it joins the Missouri River (C. Jones personal communication). In 1967, a black-footed ferret survey reported ferret sign on two prairie dog towns although no ferrets were observed (Fortenbery 1967).

No endangered or threatened species of plants are known to occur on CMR (K. Lackshewitz personal communication).

RECREATION AND CULTURAL RESOURCES

Within a 150-mile radius of CMR, there are numerous competing recreation resources which constitute a significant array of sites and areas available to the public (Table 7). Because they are so extensive in size and located

Table 7. Competing recreation resources on and within 150 miles of the Charles M. Russell National Wildlife Refuge, Montana.

Area name	Distance from CMR (miles)	State/county/province
		Montana
Ackley Lake	70	Judith Basin
Beartooth Game Range	130	Lewis and Clark
Benton Lake National Wildlife Refuge	90	Cascade
Bighorn Canyon National Recreation Area	150	Bighorn
Bowdoin National Wildlife Refuge	50	Phillips
Canyon Ferry Reservoir	150	Broadwater, Lewis & Clark
Custer National Forest	110	Various counties
Deadman's Basin Reservoir	100	Golden Valley
Freezeout Lake Game Management Area	150	Teton
Fresno Reservoir	70	Hill
Gallatin National Forest	110	Various counties
Gates of the Mountains Wilderness Area	150	Clark, Meagher
Helena National Forest	110	Various counties
Holter and Hauser lakes	150	Lewis and Clark
Lake Francis Recreation Area	130	Pondera
Lake Mason, Halfbreed and Hailstone National Wildlife refuges (satellites of CMR)	70–110	Various counties
Lewis and Clark National Forest	70	" "
Lewis and Clark National Historic Trail	-	" "
Martinsdale Reservoir	90	Meagher, Wheatland
Medicine Lake National Wildlife Refuge	90	Sheridan, Custer
Medicine Rocks State Park	100	Carter
Missouri River above Fort Benton	80	Various counties
Nelson Reservoir Recreation Area	60	Phillips
Smith River	110	Meagher, Cascade
Tiber Reservoir Recreation Area	100	Toole, Liberty
Tongue River	70	Rosebud, Bighorn
Upper Missouri National Wild and Scenic River	0–140	Various counties
Upper Musselshell River	150	" "
Yellowstone River	80	" "
		North Dakota
Headwaters of Lake Sakajawea	130	Williams, McKenzie
Lewis and Clark National Historic Trail	110	Williams, McKenzie
Theodore Roosevelt National Memorial Park	140	McKenzie, Billings
		Saskatchewan (Canada)
Cypress Hills Provincial Park	140	
Prairie Grasslands National Park (proposed)	80	

Source: Montana Department of Fish and Game 1978, North Dakota State Outdoor Recreation Agency 1975, Saskatchewan Tourism and Renewable Resources 1977.

in a lightly populated section of the country, they generally receive only limited use. In addition, there are many hiking and jeep trails, ghost towns, state parks, wildlife areas, and other recreation opportunities available to the public that tend to compete with similar opportunities available on the refuge.

Major recreation attractions on CMR include the 249,000-acre Fort Peck Reservoir and the scenic segment of the Upper Missouri National Wild and Scenic River administered by BLM. A designated national wilderness area is located at UL Bend, and fifteen additional wilderness areas comprising about 161,000 acres have been proposed for inclusion in the National Wilderness Preservation System and are awaiting Congressional action.

Considering its vast size, CMR contains relatively few developed recreation areas. Most of these are COE areas located in the vicinity of Fort Peck Townsite and the Big Dry Arm of the reservoir. Three state parks are administered by MDFWP. FWS manages the bulk of undeveloped lands on CMR. The only developed recreation areas administered by this agency are a wildlife tour route, boat access sites, and a wildlife display pasture at Lewistown.

Private cabins are located at four areas on federal land. At present there are 404 lots, 347 of which currently have structures on them. These sites are leased by COE to private individuals. Figure 8 shows existing recreation facilities.

An estimated 357,000 visitor days of use occurred on CMR in 1978. Based on information provided by BLM, the scenic river segment of the Upper Missouri National Wild and Scenic River within the refuge provided about 2,500 floater days of this use (W. Cutler personal communication). Based on a preliminary survey conducted on the refuge in 1978, 91 percent of visitors were Montanans (FWS 1978). Approximately 75 percent of the visitation to CMR originated within a 150-mile radius, 20 percent of the visitors came from places between 150-500 miles distant, and the remaining 5 percent originated from points beyond.

CMR is open to camping for two continuous weeks at any one location within any 30-day period. Fishing and hunting, together with other wildlife-related activities, are permitted on the refuge. Hunting is permitted, except in certain areas, for elk, mule and white-tailed deer, pronghorns, waterfowl, sage grouse, sharp-tailed grouse, gray partridge, ring-necked pheasants, and turkeys under state and federal regulations. In 1979, free elk permits for archery hunting were required for the first time. The harvest of game animals in 1979 included 150 elk by gun and 70 by archery, 400 deer by gun and 30 by archery, 7 turkeys and 55 pronghorns (FWS 1979). Waterfowl and upland game hunting was considered light. Trapping is currently allowed only as needed to protect resource values. A limited trapping program is being considered for the future.

Among the most popular activities on the refuge in 1978 were viewing scenery and exhibits, followed by picnicking, fishing, power boating, and camping (Table 8). The methodology used in estimating visitor use is explained in Appendix 17.

Recreation use is concentrated at a few locations on the refuge due to a lack of good roads and access to recreation areas which prevent people from fully utilizing the resources. The boating potential on Fort Peck Reservoir has not been realized (MDFWP 1978).

Because livestock occur near public use areas, there are isolated instances of minor conflicts with recreationists, such as the presence of animals and their feces in camp-picnic areas, temporary blocking of roads by small herds of cattle and spooking of game during the hunting season. Visitors passing through the refuge usually see more livestock than wild animals.

There generally have been increases in participation for all recreation activities in those portions of Montana, North Dakota, Saskatchewan, and Alberta within a 150-miles radius of the refuge. In other areas, some of these activities show decreases, such as horseback riding on trails, hunting for white-tailed deer and pronghorns, and ice fishing.

Recreation needs generally rank lowest in the area immediately surrounding the refuge on the north and east. This is explained by the lack of major urban centers there, compared to areas in the south and west which are closer to the larger cities of Billings and Great Falls. In the latter urban areas, activities for which needs are most critical include nonurban swimming, horseback riding, and backpacking. In the small part of North Dakota lying within the 150-mile radius of the refuge to the east, needs have been identified for such activities as picnicking, beach swimming and boating (MDFWP 1978, North Dakota State Outdoor Recreation Agency 1975, Saskatchewan Tourism and Renewable Resources 1977). No information was available on recreation needs for Alberta and Saskatchewan.

The National Park Service has the lead in coordinating a proposed Lewis and Clark National Historic Trail. FWS will work with NPS in this project since the explorers travelled the length of the refuge.

Proposed energy development in Eastern Montana could greatly increase the demand for recreation, while increasing gasoline prices could decrease recreation use on the refuge. No information is available on either of these items.

Table 8. Estimates of current visitation on Charles M. Russell National Wildlife Refuge, Montana.

Visitation type	Visitor days (000's)		
	FWS 1978	BLM/COE/State 1978	1978 Totals
Wildlife related			
Cultural studies	*	-	*
Environmental education	*	-	*
Interpretation			
Viewing scenery-exhibits	12	92	104
Recreation			
Hunting	10	2	12
Fishing	5	46	51
Nature observation	3	-	3
Wildlife photography	2	-	2
Backcountry travel (motor)	1	-	1
Backcountry travel (nonmotor)	*	-	*
Nonwildlife related			
Recreation			
Camping	13	19	32
Picnicking	2	75	77
Beach swimming	3	12	15
Powerboating	6	32	38
Nonpowerboating	1	5	6
Waterskiing	1	10	11
Backpacking-hiking	*	-	*
Visiting special sites	1	-	1
Horseback riding	*	-	*
Other	2	-	2
Totals	64	293	357

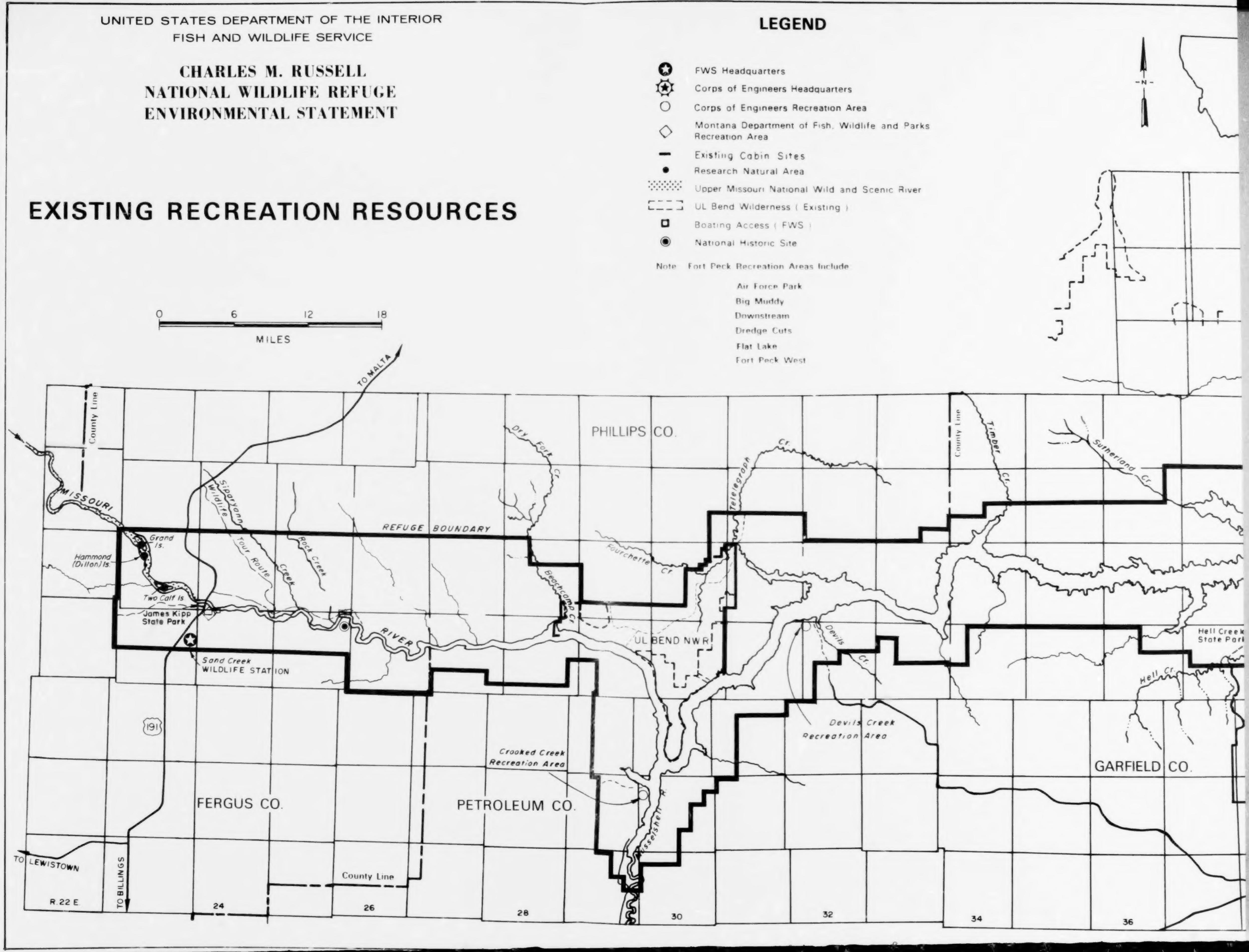
*Less than 1,000 visitor days.

Recreation needs generally rank lowest in that area immediately surrounding the refuge on the north and east. This is explained by the lack of major urban centers there, compared to those areas in the south and west where the larger cities of Billings and Great Falls are located. In the latter areas, activities for which needs are most critical include nonurban swimming, horseback riding, and backpacking. In the small part of North Dakota lying within the 150-mile radius of the refuge to the east, needs have been identified for such activities as picnicking, beach swimming, and boating (Montana Department of Fish and Game 1978, North Dakota State Outdoor Recreation Agency 1975, Saskatchewan Tourism, and Renewable Resources 1977). No information was available on recreation needs for Alberta and Saskatchewan.

UNITED STATES DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE

CHARLES M. RUSSELL NATIONAL WILDLIFE REFUGE ENVIRONMENTAL STATEMENT

EXISTING RECREATION RESOURCES



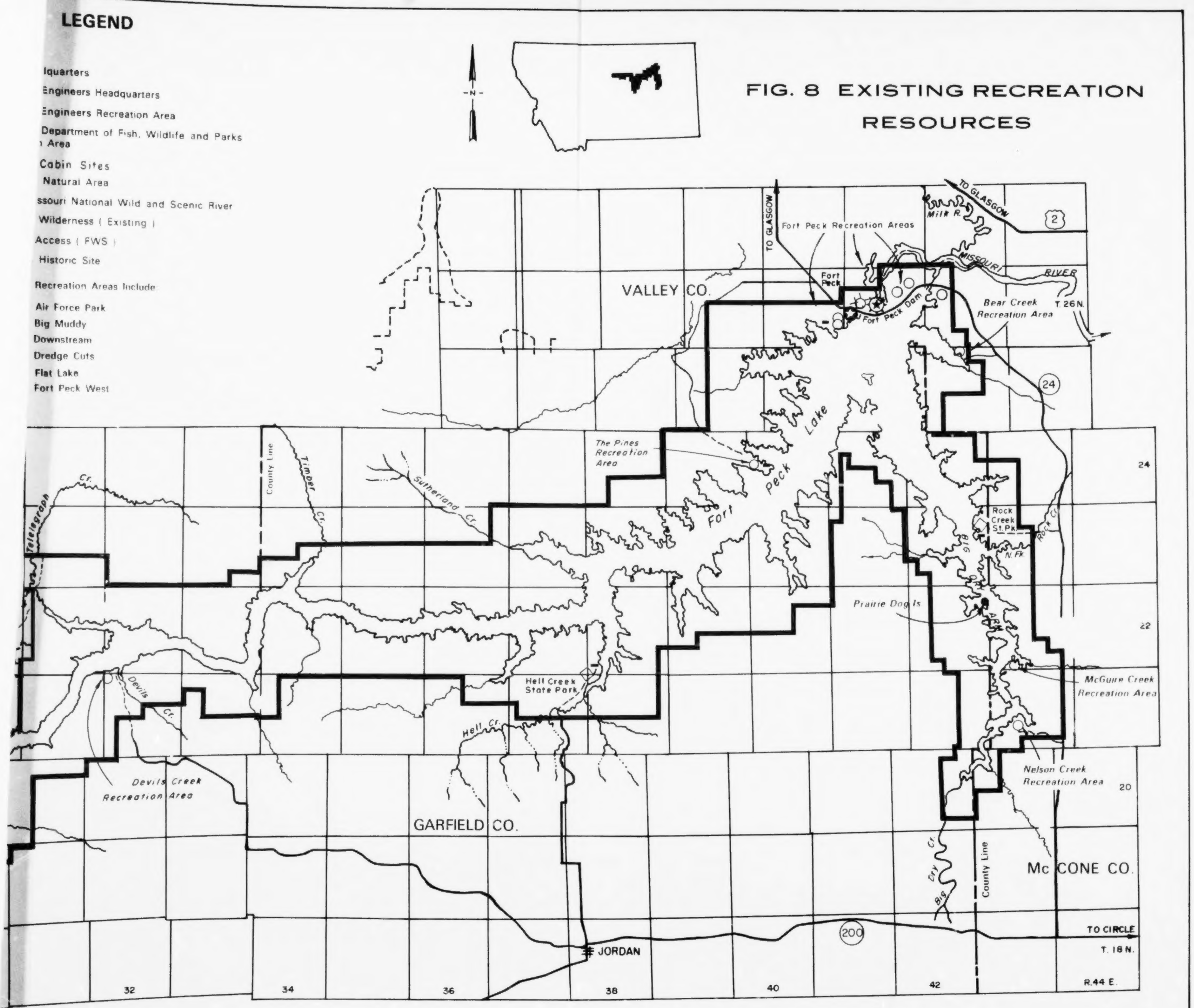


FIG. 8 EXISTING RECREATION RESOURCES

Many cultural sites appear to be significant in the history or prehistory of the refuge. Sites that have been identified include campsites, tipi rings, stone effigies, bison kill sites, homesteads, historic graves, and early townsites. A total of 153 sites, 87 historic and 66 archeological, have been identified, many of which have not been formally recorded. Of these, four historic sites have been nominated for or placed on the National Register: Rocky Point Townsite, Lewis and Clark campsites of 23 and 24 May, 1805, and the Fort Peck Theatre.

In addition, there are two designated National Natural Landmarks (Hell Creek Fossil Area and Bug Creek Fossil Area) and four research natural areas.

SOCIOECONOMICS

The region around CMR, which includes the counties of Fergus, Garfield, McCone, Petroleum, Phillips, and Valley, has been characterized by moderate economic growth with an economy based on the production of grain and livestock. Following a regional trend, the number of agricultural operations has decreased while the size and value of these operations have increased. Most agricultural products are marketed outside the area.

Farming is the largest single income producing sector of the six-county regional economy (Appendix 11). Gross income from this sector in 1975 amounted to $70.9 million and represented about 42 percent of the total income. Government led the nonfarm industries as a source of income followed by wholesale and retail trade, services, and contract construction. Range livestock-related earnings for the region averaged $50.8 million annually between 1970-75, based on a supply of about 599,200 animals (sheep and cattle). A total of about 6,050,860 AUMs is required to sustain this livestock base (BLM 1979).

Total regional income from all sources was $166,922,000 in 1975, compared to $101,694,000 in 1970 (Table 9). Data indicate that five of the six counties (Petroleum County excepted) had per capita income greater than the Montana average in 1974 (Table 10). Also, growth in per capita income for 1969-74 in the region was significant relative to per capita income growth in the United States as a whole.

Table 9. Farm income data for a six-county region at Charles M. Russell National Wildlife Refuge, Montana.

County	Total farm income ($000's) 1970	Total farm income ($000's) 1975	Total non-farm income ($000's) 1970	Total non-farm income ($000's) 1975	Total income ($000's) 1970	Total income ($000's) 1975
Fergus	$ 9,638	$16,722	$21,092	$32,703	$ 30,730	$ 49,425
Garfield	4,277	7,093	1,657	2,658	5,934	9,751
McCone	4,319	11,196	3,632	7,222	7,951	18,418
Petroleum	1,650	178	658	882	2308	1060
Phillips	10,376	13,478	6331	10,955	16,707	24,433
Valley	12,699	22,267	25,365	41,568	38,064	63,835
Six-county total	$42,959	$70,934	$58,735	$95,988	$101,694	$166,922

Source: Montana Department of Community Affairs 1978.

Table 10. Comparative 1974 per capita income for a six-county region at Charles M. Russell National Wildlife Refuge, Montana.

County-state	Per capita income	Average annual increase 1969-74 (%)
Fergus	$4,722	11.4
Garfield	4,449	11.9
McCone	6,801	16.2
Petroleum	3,751	9.4
Phillips	4,413	12.2
Valley	4,681	12.6
Montana	4,347	9.6
United States	$4,572	7.6

Source: Bureau of the Census 1977.

Table 10a. Charles M. Russell National Wildlife Refuge Study, Regionl and the Montana Economy (Fergus, Garfield, McCone, Petroleum, Phillips, and Valley counties, Montana)

Date	Employment(1)	Income(1)	Average Income(1)
1970	4,150	$17,780,000	$4,284
1975	5,503	$37,288,000	$6,776
1977	5,552	$42,794,000	$7,708
	State of Montana		
1977	175,652	$1,702,903,000	$9,695

(1) Source: County Business Patterns - Montana, Table 2, Counties - Employees, Payroll, and Establishments by Industry: 1977

Between 1960-70, employment decreased in the region (Appendix 12). However, since 1972, all counties have experienced increases in the number of persons employed over 1970. The unemployment rate increased an average of 4.6 percent from 1972-77, considerably below the statewide unemployment rate of 5.8 percent for December 1977.

Based on a preliminary survey of visitor use, costs of goods and services purchased by visitors to CMR totalled about $32/person (FWS 1978). Assuming these costs are representative for the 357,000 visitors who came to CMR, about $11.4 million was injected into the economy for food, lodging, gasoline, and related items.

The installed electrical generation capacity of Fort Peck Dam and powerplant totals 165,000 KW. The reservoir now produces over $13 million in average annual benefits derived from power production, flood control, navigation, irrigation, rentals from leasing of land, and recreation at COE areas (COE 1977).

Under provisions of the Refuge Revenue Sharing Act of 1979 (PL 95-469), as amended, payments are made to local governments. A total of $15,133.54 was distributed to the six counties in the CMR region in fiscal year 1978 under terms of this Act (FWS 1978).

In 1979, 67 grazing allotments (Figure 9) were partially or totally located on CMR; 87 individuals, companies, or associa- tions grazed livestock on the refuge. CMR records for that year indicate 60,108 federal livestock AUMs were authorized on the refuge, with 3,584 federal AUMs in a nonuse status, and 56,524 federal AUMs representing actual use. Private and state AUMs totalled 12,135 within the refuge boundary.

Federal grazing fees were $1.89/AUM in 1979. The 56,524 AUMs of grazing on federal range represented $106,830 in revenues paid to the United States Treasury.

SLB has a sliding scale for determining the amount paid per AUM on state land. This is based upon the carrying capacity of a given parcel for the grazing season. The rate for less than 14 head/section is $3.54/AUM, for 14-19 head, $3.64/AUM and over 19 head, $3.74/AUM. Most of the state lands on CMR fall in the "under 14 head" category (G. Brandenburg personal communication). AUMs in Montana on private rental lands were a minimum of $8.40/AUM in 1979 (Economic Statistics and Cooperative Service 1979).

In 1979, approximately 800 acres of CMR were farmed. This consisted of about 70 acres of grain, 450 acres of hay, and 280 acres of dense nesting cover. FWS's share was 20 acres of grain crops, 20 acres of hay, and 280 acres of dense nesting cover. No data are available on income derived by the eight cooperators from the crops they produced.

The CMR area is rural and sparsely populated. CMR occupies portions of six counties which had a 1970 population of about 34,000 (Table 11) and a 1975 estimated population of approximately 36,500. Three towns adjacent to CMR and their 1970 populations are Glasgow, 20 miles north (population 4,700); Lewistown, 65 miles southwest (population 6,437); and Malta, 69 miles north (population 2,195). Several other smaller towns and villages border the area.

As with most rural areas in the United States, there was a general population decline in the six Montana counties contiguous to CMR from 1960-70. In the period 1960-70, while the population in Montana as a whole was increasing by nearly 3 percent, these counties decreased by nearly 28 percent. However, from 1970-75, this trend was at least temporarily reversed because population in the six-county area increased by 7 percent.

Population growth for the area within 150 miles of the refuge, excluding Canada, is expected to increase by about 85,000 people between 1978-2000 (Montana Department of Community Affairs 1978, Murdock and Ostenson 1976). Potential energy developments, especially coal, could significantly impact population growth. However, the magnitude of this impact is presently unknown.

Table 11. Demographic data for counties contiguous to Charles M. Russell National Wildlife Refuge, Montana.

	Area mi^2	1960 population	1970 population	1975 population	Population $/mi^2$, 1970	Change 1960-70 (%)	Change 1970-75 (%)
Fergus	4,327	13,400	12,600	12,925	2.9	-6.0	+2.6
Garfield	4,812	1,800	1,714	1,781	0.4	-4.8	+3.9
McCone	2,652	3,000	2,799	2,709	1.1	-6.7	-3.2
Petroleum	1,684	800	675	659	0.4	-15.6	-2.4
Phillips	5,287	6,000	5,224	5,388	1.0	-12.9	+3.1
Valley	5,104	22,200	11,038	12,982	2.2	-50.3	+17.6
Total	23,866	47,200	34,050	36,444	1.4	-27.9	+7.0
Montana	147,138	674,767	694,409	746,244	4.7	+2.9	+11.6

Source: Bureau of Land Management 1979, Montana Department of Community Affairs 1977.

UNITED STATES DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE

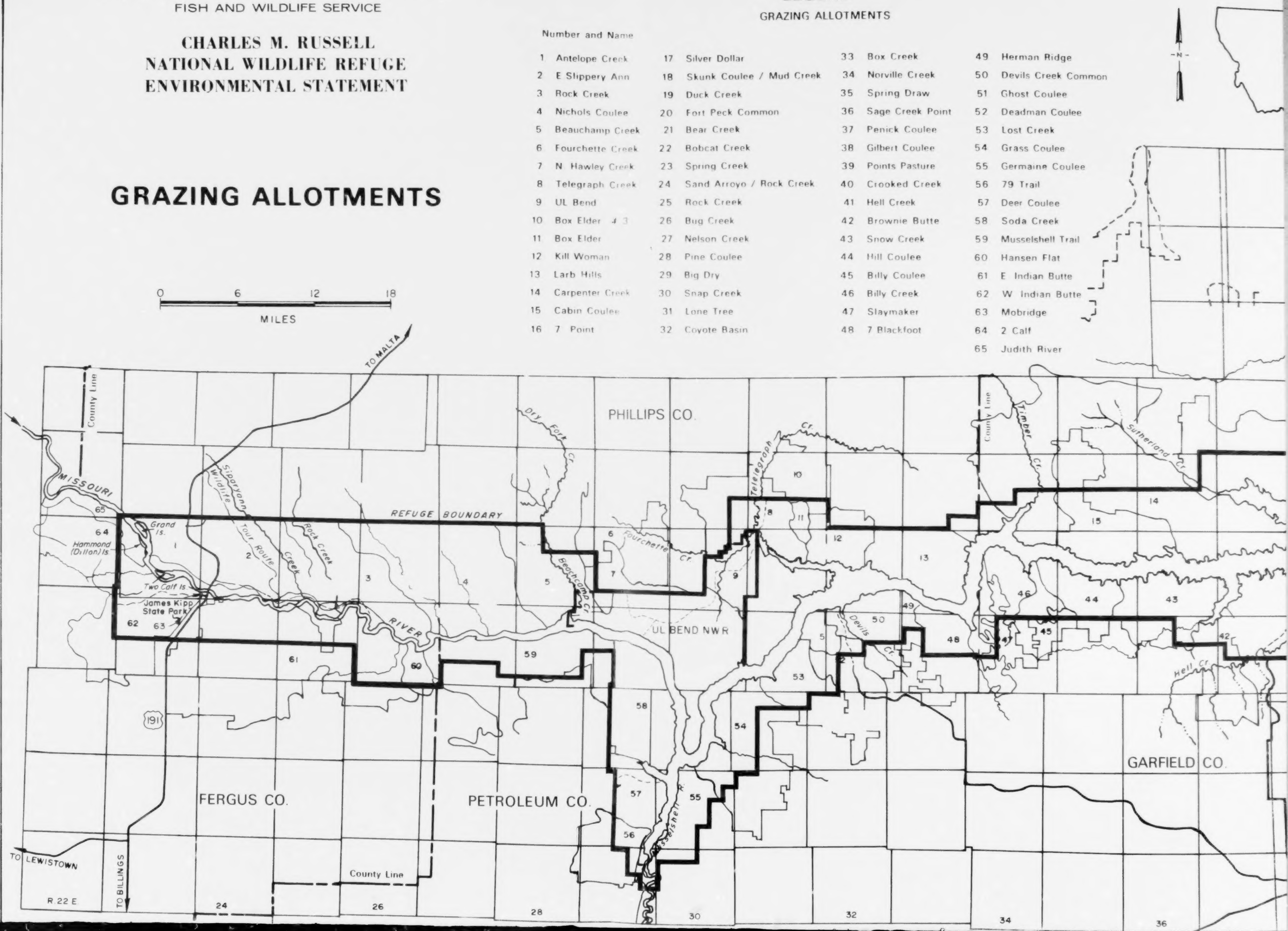
CHARLES M. RUSSELL NATIONAL WILDLIFE REFUGE ENVIRONMENTAL STATEMENT

GRAZING ALLOTMENTS

LEGEND

GRAZING ALLOTMENTS

Number and Name	
1	Antelope Creek
2	E Slippery Ann
3	Rock Creek
4	Nichols Coulee
5	Beauchamp Creek
6	Fourchette Creek
7	N Hawley Creek
8	Telegraph Creek
9	UL Bend
10	Box Elder 4 3
11	Box Elder
12	Kill Woman
13	Larb Hills
14	Carpenter Creek
15	Cabin Coulee
16	7 Point
17	Silver Dollar
18	Skunk Coulee / Mud Creek
19	Duck Creek
20	Fort Peck Common
21	Bear Creek
22	Bobcat Creek
23	Spring Creek
24	Sand Arroyo / Rock Creek
25	Rock Creek
26	Bug Creek
27	Nelson Creek
28	Pine Coulee
29	Big Dry
30	Snap Creek
31	Lone Tree
32	Coyote Basin
33	Box Creek
34	Norville Creek
35	Spring Draw
36	Sage Creek Point
37	Penick Coulee
38	Gilbert Coulee
39	Points Pasture
40	Crooked Creek
41	Hell Creek
42	Brownie Butte
43	Snow Creek
44	Hill Coulee
45	Billy Coulee
46	Billy Creek
47	Slaymaker
48	7 Blackfoot
49	Herman Ridge
50	Devils Creek Common
51	Ghost Coulee
52	Deadman Coulee
53	Lost Creek
54	Grass Coulee
55	Germaine Coulee
56	79 Trail
57	Deer Coulee
58	Soda Creek
59	Musselshell Trail
60	Hansen Flat
61	E Indian Butte
62	W Indian Butte
63	Mobridge
64	2 Calf
65	Judith River



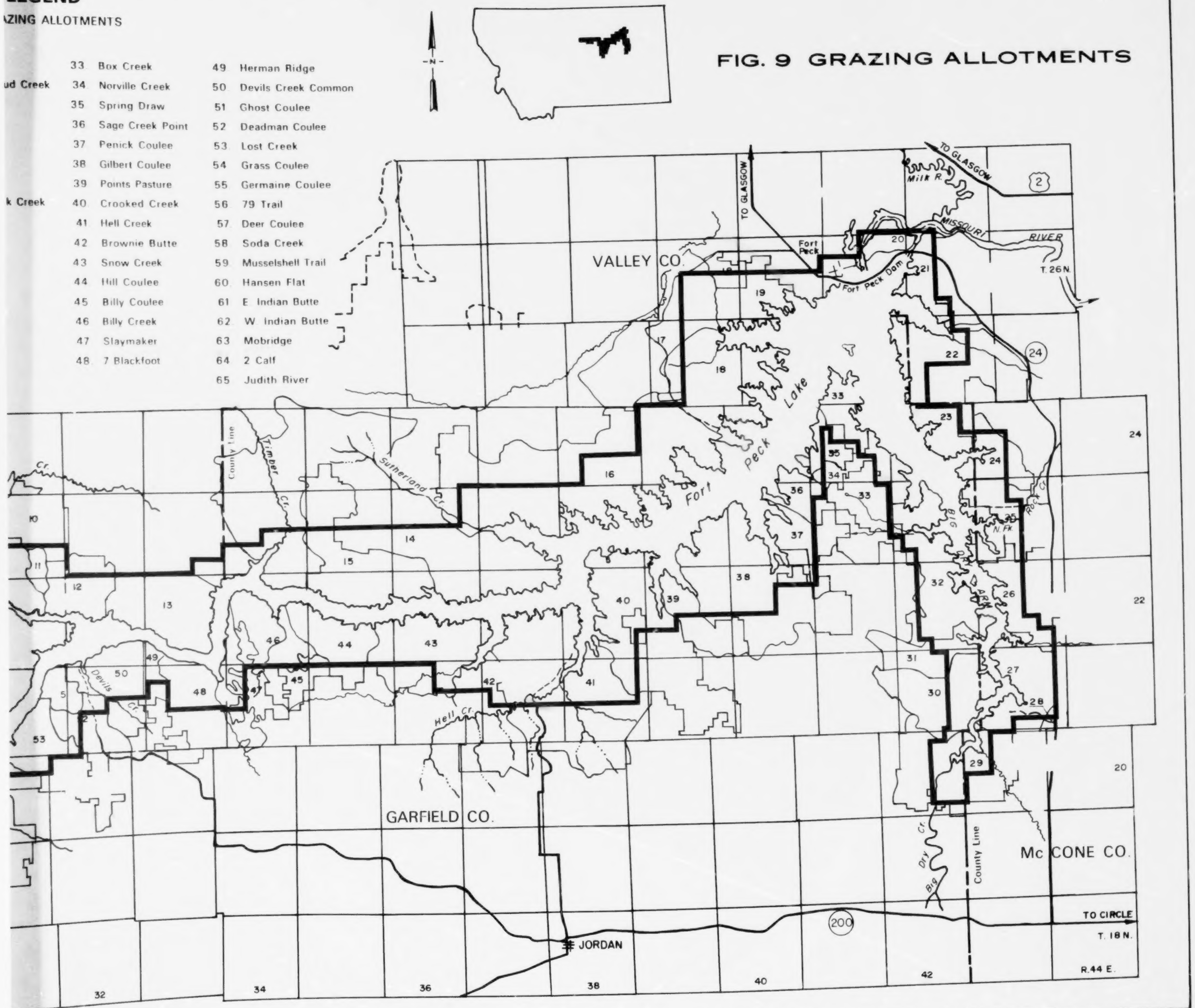


FIG. 9 GRAZING ALLOTMENTS

LEGEND

ZING ALLOTMENTS

ud Creek

k Creek

33	Box Creek
34	Norville Creek
35	Spring Draw
36	Sage Creek Point
37	Penick Coulee
38	Gilbert Coulee
39	Points Pasture
40	Crooked Creek
41	Hell Creek
42	Brownie Butte
43	Snow Creek
44	Hill Coulee
45	Billy Coulee
46	Billy Creek
47	Slaymaker
48	7 Blackfoot
49	Herman Ridge
50	Devils Creek Common
51	Ghost Coulee
52	Deadman Coulee
53	Lost Creek
54	Grass Coulee
55	Germaine Coulee
56	79 Trail
57	Deer Coulee
58	Soda Creek
59	Musselshell Trail
60	Hansen Flat
61	E. Indian Butte
62	W. Indian Butte
63	Mobridge
64	2 Calf
65	Judith River

The age distribution of people residing in the region is comparable to that of Montana as a whole. Compared to the state, the region has approximately half as many physicians per person; two counties have no physicians. Only 5 percent of Montana's population resides in the six-county CMR region, making this a comparatively undeveloped area with few of the major problems faced in rapidly growing regions.

The general decline in regional population parallels a similar decrease in the number of farms between 1969-74. Although the region is still predominantly rural, it seems there is a trend toward urbanization.

Median family income for the region in 1970 averaged about $900 less than for the state, and the number of families classified at the poverty level was higher in the region. Those who continue to farm need more land than previously to maintain their standard of living.

Approximately 7 percent of the property valuation and 6 percent of the taxable valuation in Montana is located in the six-county CMR region. Most of this value is associated with Fergus and Valley counties where more than half the regional population is concentrated.

Nearly 6 percent of the 1974 property taxes in Montana were paid by residents of the region where only 5 percent of the population lives. This is indicative of the higher per capita taxation in the region, which was slightly more than $150 higher per person than for the state.

Billings (1977) noted, "...Montana's game animals are an acknowledged resource for residents and non-residents, and for hunters and general observers. Over 55 percent of the men and over 20 percent of the women in Montana claim to be hunters, and fewer than one in seven oppose hunting. Whether they hunt or not, approximately 70 percent of Montana's residents make special efforts to observe wildlife in its natural setting."

Comments received at public meetings and through correspondence and personal contacts conducted as part of the overall planning effort, covered the full range of management interests, from protection and proper management of wildlife to management of CMR primarily for livestock. Individuals who rely on livestock grazing for a living favored multiple use of the refuge and minimum interference by government in cattle operations as historically practiced. In contrast, those sensitive to wildlife favored management of CMR primarily for wildlife. Special interest groups representing agriculture generally preferred to include livestock interests on a planning and advisory board for CMR and to continue grazing as in the past. Those who represented wildlife interests preferred habitat preservation for wildlife through appropriate restraints such as conservative grazing by domestic livestock. Others wanted no grazing, hunting, or roads; still others wanted mass recreation and development.

IV. ENVIRONMENTAL CONSEQUENCES

IV. ENVIRONMENTAL CONSEQUENCES

This chapter analyzes the significant environmental effects of the five alternatives discussed in Section II. The five elements or management actions common to all alternatives, which may significantly affect the environmental quality of the refuge, are endangered and unique species introduction, wildlife habitat management, recreation and cultural resources management, forage allocation, and range developments.

The following basic assumptions were made for all alternatives to facilitate analysis:

1) The chosen alternative would be implemented if adequate funding and manpower are made available.

2) After a management plan is selected, actions that are implemented would be monitored. Necessary adjustments would be made to correct those actions that are not meeting objectives.

3) Short-term impacts are those which would occur during implementation, approximately 1985 through 1990; long-term impacts are those projected to exist when the wildlife objectives are met (i.e. by the year 2005 or later).

4) Unauthorized human and livestock use would be strictly controlled under each alternative and would not be a significant factor affecting environmental quality.

5) Because habitat is recognized as the key to wildlife abundance, this document emphasizes habitat quality and quantity rather than wild animal population numbers or densities. Where possible, the habitat capability to support numbers of animals per unit area has been used. Establishment of high quality habitat will provide adequate populations of wildlife species within constraints imposed by drought, severe winters, disease, and other variables which are largely uncontrollable.

ALTERNATIVE A

(No Action)

SOILS-WATERSHED

Habitat management to control all burning would result in coniferous communities proceeding to climax and could increase the potential for destructive wildfires. If areas were burned, it could result in temporary loss of vegetative cover, increased runoff, and soil loss until vegetation is restored. In favorable years, fall "green-up" can occur and eliminate erosion problems on areas burned the preceding summer. Once herbaceous vegetation is restored, erosion would probably be reduced below levels associated with the coniferous forest communities. Eichhorn and Watts (1974) observed that erosion potential was less for coniferous forest sites that had been burned and replaced with a grassland community as compared to forested communities with their sparse understory vegetation.

Grazing patterns would not significantly change present ranges of bare ground (60-75 percent) on marginal breaks, badlands or shale areas, or those ranges (20-42 percent) presently existing on better quality clayey, sandy, or silty range sites. However, a present slight upward trend in range condition would provide for some increased plant and litter cover over the refuge as a whole by the year 2000. This would provide a slight enhancement to soil productivity and watershed quality as compared to present conditions.

Livestock concentration areas, particularly around watering areas, would continue to exhibit soil erosion and watershed quality problems because of poorer range conditions and trampling effects. Marginal sites that are highly fragile, such as thin breaks, badlands, and shale, would receive some livestock use under this alternative. Any use on these areas by livestock tends to increase soil or parent material loss because of vegetation cover removal and livestock movements (W. Larsen personal communication). Poorly located reservoirs would continue to silt-in at accelerated rates. Lusby (1970) found that runoff rates on Mancos shale derived soils, which react much like Bearpaw shale, averaged 30 percent less on ungrazed watersheds versus grazed watersheds, and sediment yields were about 45 percent less. His studies indicated that runoff was directly related to the percentage of bare soil on the watershed, with hydrologic changes caused by the trampling of livestock on soil loosened by frost heavings.

Although refuge-wide range condition shows a slight upward trend which would bring some long-term increase in productivity, short-term enhancement would be minimal. Soil lost as a result of accelerated (man-caused) erosion would be a long-term impact and an irretrievable loss.

WILDLIFE HABITAT-RANGE RESOURCES

Fire management would involve suppression of most wildfires. There would be no prescribed burning. This could reduce the extent of several communities and eventually the diversity of wildlife habitat. The existing fisheries management program would result in no significant environmental impacts.

Wildlife habitat would not change substantially under the No Action alternative. Lack of residual cover and shrubs would remain as major problems. Wildlife population levels would remain about the same also.

Bighorn sheep habitat would be adversely affected due to grazing by cattle on winter range near Two Calf Creek (Constan 1978). Continued competition with livestock and periodic severe winters in the Two Calf herd would keep sheep at low numbers and preclude any effective management program. Bighorn sheep habitat in the Mickey-Brandon Butte area would not be affected by livestock.

Sharp-tailed grouse habitat would remain in fair condition. Eighty-one percent of all samples taken in the 1978 survey indicated sharp-tailed grouse lack 8-10 inches of residual cover required for successful nesting (Christenson 1971, Sisson 1976). Habitat to support 5-10 birds/sq. mile would be maintained.

The quantity and quality of forbs would be limited. Insufficient forb productivity occurred on 46 percent of the areas sampled for pronghorns and 65 percent of the areas sampled for mule deer. They feed on such plants from spring to late summer (Mackie 1970, Hoover et al. 1959, Cole and Wilkins 1958).

Vegetation around ponds would remain inadequate to provide desirable nesting cover for waterfowl. Bent (1923), Bennett (1938), Burgess et al. (1965), and Drewien and Springer (1969) stated vegetation less than 1.5 feet tall and covering less than 75 percent of the ground is inadequate for nesting waterfowl. The Creston Valley Wildlife Management Authority (1974) cited several studies which correlated high waterfowl nesting densities and success rates with undisturbed stands of vegetation (Nelson 1972, Schranck 1966, Bue et al. 1952, Keith 1961). On 89 percent of the CMR ponds sampled in 1978, herbaceous upland vegetation was less than one foot tall and had less than 69 percent ground cover (FWS 1978). Grazing by livestock has resulted in less than optimal waterfowl habitat conditions on many potentially suitable ponds on CMR.

Rodents lacked sufficient cover on 79 percent of sites sampled, and this condition would persist. This would lower quality of hunting habitat for raptors and terrestrial carnivores.

Trampling and consumption of desirable browse species would be extensive: 75-90 percent of all areas sampled for habitat quality had inadequate browse (FWS 1978). Several livestock allotments on the Big Dry Arm demonstrate the effects of substantial livestock grazing, which has resulted in poor browse communities. Other allotments in this area that have experienced light or no livestock use in recent years have well developed browse communities. A static or downward trend in these communities would continue, meaning inadequate food and cover for sharp-tailed grouse and mule deer which rely heavily upon hardwood draws for portions of their life requirements (Severson 1966). This would help hold the sustained deer habitat capability at the estimated level of 5-6 deer/sq. mile. The present browse communities would probably not experience the slight upward trend in condition that the refuge as a whole would experience. Shrub communities would continue to receive a disproportionate amount of livestock use, which would be reflected by static or deteriorating conditions.

Dense stands of big sage are lacking on 67 percent of the sagebrush areas sampled. These food and cover requirements are needed for pronghorns and sage grouse (Bayless 1969, Wallstead 1971, Klebenow 1969). This is especially true in Garfield and McCone counties and the central Phillips County portion of CMR, which contains the primary range for pronghorns. Silver sage, a prime winter food for pronghorns (D. Pyrah personal communication, Cole and Wilkins 1958), is lacking in the central Phillips County area.

Livestock use under No Action would tend to perpetuate or expand the existing sagebrush flat areas by their use patterns (Kindschy 1977). Moderate to heavy livestock grazing during spring and summer favors shrubs such as big and silver sage at the expense of more palatable grasses and forbs (Smith 1979). The expected result would be to benefit the present sagebrush communities because of present use patterns by livestock. Although range conditions may be actually lowered in these areas, some habitat enhancement for such species as pronghorns and sage grouse could be expected because of possible sagebrush expansion.

Security cover for elk in the form of dense canopies of ponderosa pine, juniper, and pine-juniper (Campbell 1978) would continue to be inadequate on the north side of the reservoir. This lack of security cover plus the presence of numerous roads and their associated vehicular traffic causes elk to widely disperse during the hunting season, and some animals do not return. Herds would remain at their current size of 1,300-1,500 over-wintering animals. The presence of numerous roads for which no adequate control of access exists would continue to lower habitat values for elk and deer. Perry and Overly (1977) found that roads, and disturbances associated with roads, exerted a considerable influence on elk and deer use of habitat. Elk use was reduced by 95 percent and deer use by 100 percent under the most extreme case studied, which was a "main road" in a meadow situation. The lack of dense tree stands also means lack of thermal cover (Forest Service 1977).

The riparian areas along the Missouri River would be maintained for white-tailed deer through maintenance of present fences. These areas are in good condition and would remain in about the same condition (FWS 1978).

Minor riparian areas along continuous and intermittent streams across the refuge are not fenced, and thus are accessible to cattle. This would perpetuate the existing poor deciduous browse conditions for wildlife. Severson and Boldt (1978) indicated livestock use in shrubby draws results in lack of shrub production because of tight sod-bound soil, lower moisture infiltration, and higher soil temperatures.

Off-refuge impacts associated with No Action would be minimal. Habitat quality for wildlife would probably remain unchanged as a result of maintaining present livestock levels on the refuge.

Coyotes can cause significant economic loss to ranchers. Removal of the individual animals responsible for the damage would eliminate or reduce the problem and have no lasting effects on predator populations. Avoiding control of prairie dogs or other small mammals would allow healthy, productive populations of prairie dogs and 30+ species associated with them. It would preclude any possible killing of black-footed ferrets.

The effect of coyote depredation on deer populations appears to be relative to moisture conditions and rodent levels (Dood 1978, Pyrah 1979). Dood's work in the Missouri River breaks indicated that fawn mortality was related to habitat use in the summer months. When precipitation was adequate to keep forbs green, does and their fawns used open habitat types. When moisture was inadequate, forbs dried up and does moved with their fawns into heavy timber types to use browse. Coyote depredation on fawns was higher when fawns were in the open types in all cases. Work by Pyrah (1978) showed that deer mortality from coyote depredation was less in two very severe winters as opposed to two normal or open winters. He correlated the lighter mortality in the severe winters with high small-mammal populations. Coyotes preyed heavily on the small mammals and less so on the deer.

Inability to predict adequate moisture levels or rodent populations which affect coyote depredation on deer makes it difficult to predict the level or extent of depredation in any given year.

Continuation of present forage allocations would maintain lower than desired levels of wildlife habitat quality. Competition between wildlife and livestock for security cover and choice feeding sites would continue at present levels. Mackie (1970) observed that numbers and management of livestock should be considered on the basis of forage available on primary range areas rather than on the entire area. Livestock would be allocated forage on the basis of the entire area under this alternative. An examination of the 1952-53 range survey summary for the refuge revealed that wildlife are presently primarily allocated forage on Class VIII lands which are unsuitable for livestock use and suitable only for watershed, recreation, and wildlife values. The forage on the best areas was allocated almost solely to livestock.

Forage allocations would continue to be dominantly in favor of livestock. A slow upward trend in condition would occur over about 75 percent of the refuge. This trend would continue and would be expected to raise range conditions to excellent on 20 percent of the grazed portion of the refuge by the year 2000 (compared to the present level of 18 percent). Some range deterioration would continue as a result of overstocking on some allotments, especially in the Big Dry Arm portion of the refuge. About 10 percent of the grazed portion of the refuge would be in fair to poor condition by the year 2000 as opposed to the present figure of about 8 percent. Continued over-grazing of those allotments in deteriorated condition could compound the situation for the entire allotment, as livestock are forced to range farther from preferred range to find forage. Those allotments constitute a minority on a refuge-wide basis, however, and the overall range trend would continue to be slightly upward.

The slow upward trend for the refuge as a whole would mean that additional AUMs would be available for livestock or wildlife use (minimum of 1,000 AUMs by the year 2000).

Forage allocations to livestock would continue to depress habitat values for wildlife. Habitat values for wildlife would stay at or near present levels. There would be continued heavy use of range areas by livestock near water and on level to moderately sloping terrain. Use of primary wildlife areas by livestock would be heavier than desirable in some locations near dependable water. Lack of water in other areas would minimize all livestock use. The interspersion effect thus created would have beneficial impacts on some species of wildlife. Birds of open areas, such as prairie horned larks, lark buntings, and several species of shorebirds would benefit from livestock grazing effects. Prairie dogs and animals closely associated with prairie dog towns would benefit because localized disturbances such as overgrazing, which originally allowed establishment of many of the towns, would continue.

Seasons of use would continue to detract from overall range improvement potential. Several allotments have year-long or early spring grazing authorized on a recurring basis. This type of grazing is not conducive to range improvement because the same localized areas are continuously subjected to heavy use with deterioration of plant and soil resources resulting.

No new range developments which would significantly affect wildlife and wildlife habitat are proposed under this alternative. However, maintenance of some existing range facilities would have adverse impacts on wildlife habitat. Several improvements such as ponds in hardwood draws or breaks are presently located in primary wildlife habitat. Continued maintenance of these sites in important wildlife areas might increase opportunities for game-livestock competition.

Mackie (1970) felt that control of water associated with primary cattle range could serve as a tool to provide better livestock distribution and lessen opportunities for game-livestock competition. He recommended no water developments on terminal portions of larger ridges or on smaller ridges where the area available for livestock is limited. This would lower the likelihood of game-livestock competition on important wildlife range.

The retention of private cabin sites and developed recreation areas would continue to exclude a limited amount of land from use as wildlife habitat and would result in loss of wildlife populations associated with such habitat.

In summary, wildlife and range objectives would not be met.

RECREATION AND CULTURAL RESOURCES

Generally, this alternative would contribute the least toward meeting national and regional recreation requirements and needs identified in the Nationwide Outdoor Recreation Plan (Bureau of Outdoor Recreation 1973) and Montana Statewide Outdoor Recreation Plan (MDFWP 1978). It also would accomplish little in terms of meeting recreation objectives established for CMR.

Present forage allocations would provide for undesirable aesthetic qualities in several allotments which have a considerable portion of deteriorated range. Most of these allotments are found in the Big Dry Arm which receives a considerable amount of recreational use during the grazing season when poor range conditions are most obvious.

Maintenance of the No Action alternative would provide ample viewing opportunities of prairie dogs and other species associated with poor or fair range conditions. Some increases in visitation are anticipated from minor improvements in interpretive facilities.

Since there would be only limited development or expansion of existing recreation areas, concentrated public use would continue in the vicinity of major recreation areas, especially at COE sites near Fort Peck and along the Big Dry Arm segment of the reservoir and between Fred Robinson Bridge and Seven Mile Creek on the west.

Impacts of public use on lands adjacent to the refuge would be similar to those on the refuge where comparable conditions and facilities occur. Most roads would remain unusable in bad weather, and nonwildlife-oriented uses would predominate.

Reservoir water level fluctuations would continue to periodically inundate the headwaters area, causing alterations to wildlife habitat and associated wildlife-related recreation opportunities.

Historic buildings and archeological/paleontological sites would be identified and preserved in accordance with existing law. A few of the more significant sites would be nominated to the National Register of Historic Places if they qualify.

SOCIOECONOMICS

As mentioned previously, there are presently 60,108 federal AUMs permitted on the refuge: 3,584 of these are in a nonuse status. Additional AUMs are utilized on state and private lands located within the boundaries of the refuge and amount to about 20 percent of the federal AUMs permitted by FWS. The number of FWS permitted AUMs would remain the same for 1990 and 2005. Because this alternative does not affect the number of future AUMs on the refuge, no direct or indirect economic effects would occur due to grazing, and little or no impacts to operators who graze livestock on CMR would occur. It would provide for continuance of the lifestyles to which they are accustomed and would result in minimal new governmental interference with their operations.

In 1978, recreation visitor days totaled 357,000 (Table 12). Changes attributable to this alternative would be the difference between the 1978 figures and the estimate for 1990 and 2005. The direct economic effects are estimated to be $132,100 between 1978-90 and $112,200 between 1991-2005. Present value of these direct effects is $667,800. The figures are not adjusted for any anticipated price level changes.

Indirect economic effects of an additional 21 man-years of employment and $153,900 in income would result from an increase in visitation between 1986 and 2000.

Table 12 summarizes the noneconomic effects which would result from implementation of the No Action alternative. A detailed economics methodology is presented in Appendix 13.

Table 12. Noneconomic effects, No Action alternative, Charles M. Russell National Wildlife Refuge, Montana.

	Present situation (1978)	No Action	
		1990	2005
Habitat quality[1]			
Sharp-tailed grouse	4.6	4.6	4.7
Mule deer	5.6	5.6	5.8
Pronghorns	5.2	5.2	5.3
White-tailed deer	5.4	5.4	5.6
Elk	6.0	6.0	6.2
Waterfowl	3.4	3.4	3.4
Development			
Burn (acres)	0	0	0
Plant trees (acres)	0	0	0
Plant shrubs (acres)	0	0	0
Soil ripping (acres)	0	0	0
Ponds (acres)	0	0	0
Fences (miles)			
Exclosure[2]	0	0	0
Boundary (aprx.)	50	56	56
Interior	Unknown	0	0
Water projects (No.)			
Ponds (aprx.)	150	150	150
Troughs	13	13	13
Springs	0	0	0
Visitor days			
FWS	64,000	67,000	68,000
Other	293,000	326,000	356,000
Total	357,000	393,000	424,000
Forage (AUMs)			
Wildlife	50,000	50,000	51,000
Livestock (active)[3]	56,524	56,524	56,524
Total	106,524	106,524	107,524
Range condition (%)			
Poor	1	1	1
Fair	7	8	10
Good	74	72	69
Excellent	18	19	20

[1] 0-2.5 = poor, 2.6-5.0 = fair, 5.1-7.5 = good and 7.6-10.0 = excellent.

[2] A precise estimate of acres enclosed/mile of fence is not provided due to presently undetermined topography and shape of exclosure. A general rule of thumb is 40 acres enclosed per mile of fence.

[3] These figures represent active AUMs; 3584 AUMs are inactive; thus the total is 60,108 AUMs.

ALTERNATIVE B

(Proposed Action)

SOILS-WATERSHED

Fire management practices would result in the opening of some coniferous forest stands to increase grass, forb, and shrub levels to retard runoff and soil loss. Eichhorn and Watts (1974) observed that the evergreen litter and tree overstory of unburned sites are less effective in reducing erosion than nontree vegetation on burned sites. Grazing reductions, planting, and exclosures would provide more residual cover and shrub communities which would also retard runoff and decrease erosion.

Areas on level to moderate slopes and within one mile of water would generally receive light to moderate use by livestock because of reduced stocking levels. Steep terrain with over 20 percent slope gradient (containing many of the more fragile areas such as shale, breaks, and badland range sites) would receive little or no livestock grazing. Any use on those areas would tend to increase soil or parent material loss because of vegetation cover removal and livestock movements (W. Larsen personal communication). Soil erosion on these fragile areas would be reduced and essentially confined to geologic processes. Increased litter cover on areas considered to be principal livestock range would be expected.

Bare soils on the most productive range sites, such as clayey, silty, sandy, and overflow, would be lowered from the present average range of 20-42 percent to 15-25 percent by 1990. This would lower present rates of erosion by allowing increased water infiltration into the soil and reducing amounts of soil exposed to the elements. Overland runoff and sedimentation would be lowered, and water quality would be enhanced.

Boundary and interior fences would help improve soils and watershed conditions within several allotments through control of livestock. This would help improve range conditions and ultimately soils and watershed values through increased plant and litter cover. This would benefit wildlife habitat. No significant detrimental impacts are expected to occur to wildlife as a result of fence construction.

A water facility proposed for the Kill Woman allotment and approved for construction by the Soil Conservation Service would help eliminate a headcutting problem in one drainage through control of runoff. Other water facilities planned would result in only minor enhancement of soils and watershed conditions.

WILDLIFE HABITAT-RANGE RESOURCES

Reintroduction of black-footed ferrets and peregrine falcons would provide additional wildlife diversity on CMR and help perpetuate these two species. Reintroduction of black-footed ferrets would involve maintenance of prairie dog towns. These areas would remain in poor range condition, but would provide desirable wildlife habitat for several wildlife species. Prairie dog expansion onto adjacent landowners' lands might necessitate control measures, as would increases of prairie dogs beyond 10,000 acres.

Reduction or elimination of livestock AUMs would occur where competition between bighorn sheep and livestock occur. There would be increased residual cover which would provide more forage for bighorn sheep. Eichhorn and Watts (1976) assessed livestock-bighorn sheep competition in the Two Calf drainage, indicating that limited winter habitat and competition with livestock have limited the success of the sheep reintroductions there. Bighorn sheep would increase in number as a result of reduced competition with livestock.

It is expected that 70 percent of potentially suitable sites would have 8-10 inches of residual cover by 1990. This would provide sharp-tailed grouse with the cover they require for nesting (Christensen 1971, Sisson 1976) and would increase spring bird populations from approximately 5 birds/sq. mile to a projected level of 30 birds/sq. mile on suitable habitat (FWS 1978). This would also provide improved shelter and protection from predation for all ground nesting birds, improved night roosting areas for sharp-tailed grouse, improved insect food sources for bluebirds, more cover for small rodents and porcupines, and a greater forage supply for mule deer, elk, and pronghorns.

Approximately 30 percent of the suitable areas would not attain this level of cover by the year 2005 because areas on level to moderate slopes and within one mile of water would receive light to moderate use by livestock. These areas would have less cover and thereby benefit species such as mountain plovers, burrowing owls, ferruginous hawks, prairie horned larks, and prairie dogs (BLM 1979).

Changes from sheep to cattle and changes in grazing intensities and seasons of use would increase forbs for pronghorns and mule deer by 30-35 percent. According to Mackie (1970), forbs constitute an important component in the summer and fall diet of mule deer in the Missouri River breaks. Cole (1956) made similar statements for pronghorns.

The response of small mammals to increased amounts of cover and available forage would be varied. Voles, which rely heavily on grass for food and cover, would increase while deer mice, which use plant seeds to a greater extent for food and are better adapted to sparsely vegetated areas, would probably decrease (Black 1968, R. Moore personal communication).

Grazing would maintain stands of big and silver sage at present levels: different intensities of livestock use would modify plant composition to favor sagebrush (heavy use in early spring) or grasses and forbs (light or no use). This would provide enhanced fawning areas and winter cover for resident pronghorns (Bayless 1969). Different treatments would change habitat conditions to meet particular wildlife needs in terms of food or cover at critical periods of the year. Large numbers of pronghorns move into the breaks and CMR during severe winters. When these conditions occur, pronghorns need the best possible habitat conditions to survive. Improved habitat conditions under the Proposed Action would enhance survival of the herds using the refuge at these critical periods.

Prodgers (1979) stated:

> "Shrub dominated communities afford some of the best wildlife habitat on the CMR NWR by providing food, cover, and perches. With a few exceptions (such as rabbitbrush, sagebrush, and greasewood), shrubs are found on sites with above average moisture and low or normal soil salt levels...
>
> "Shrubs were much more abundant on the Refuge prior to the great drought of the 1930's. Murie (1937) observed that as much as 95 percent of the buffaloberry was dead in 1935, and severe drought lasted several years after that. When attempting to establish more shrubs on the Refuge, the Manager should recognize that success will be nil in drought years, though shrubs established in prior years may persist, perhaps as a function of length of establishment...
>
> "If shrubs are established on suitable sites, they can be expected to reproduce naturally within several years and thus colonize suitable adjacent areas. However, most shrubs are palatable to livestock, and grazing could endanger not only reproduction, but survival itself. Seeded or planted areas should be protected from grazing until desired shrub abundance is achieved, and thereafter, the effects of grazing should be carefully monitored..."

Prescribed burning on approximately 7,700 acres, planting of suitable shrubs on approximately 500 acres, and construction of livestock exclosures in key hardwood draws would improve the all-important shrub communities by the year 2005. This would provide an increased food base for deer and upland game birds as well as cover for deer, sharp-tailed grouse, and many small birds and mammals.

Seventy percent of the suitable hardwood draws would have the desired shrubs by the year 2005. Because shrub responses are slower than the effects of reduced grazing upon herbaceous cover levels, continual improvement in shrub quality would occur for another 40-50 years.

Eichhorn and Watts (1974) found that burned areas in the Missouri breaks produced substantially more forbs and shrubs than unburned control sites. Those shrubs which could be enhanced on the refuge by proper fire management include rose, chokecherry, snowberry, buffaloberry, serviceberry, and skunkbrush sumac (FWS 1978). Mule deer, sharp-tailed grouse, pronghorns, and white-tailed deer would all benefit from an increased food base. There would also be summer cover for mule deer, sharp-tailed grouse, songbirds, porcupines, bobcats, and elk. Winter roosting areas for sharp-tailed grouse would be enhanced as would nesting sites for passerines and winter use areas for mule deer and bobcats. Habitat quality for sharp-tailed grouse would increase from fair to good (56 percent increase in habitat quality) by the year 2005, and mule deer habitat in hardwood draws would increase in quality by 28 percent for the same period (Appendix 14).

The few riparian zones proposed to be fenced would improve substantially. Unfenced riparian zones would receive light overall grazing use and re-establish riparian habitat more gradually than the fenced areas. Good habitat would be achieved by the year 2005 on these unfenced riparian areas, which include Slippery Ann, Rock (west), Timber (east), and Fourchette, Big Dry, Squaw, and Hell creeks. Although riparian areas and ponds would continue to sustain a disproportionate share of livestock grazing, reductions in AUMs under this option would substantially reduce pressures on areas that are over-utilized. To restore and maintain vegetative quality and vigor to all important riparian areas and ponds, livestock grazing would have to be eliminated in the entire allotment or the areas completely fenced (Hormay 1976). Most of the upland ponds would still have limited value as waterfowl production areas.

Bottoms along the Missouri and Musselshell rivers would continue to remain fenced and unavailable to livestock except on a prescription basis. This would preserve the riparian community and maintain the overall wildlife habitat for white-tailed deer and other bottomland species in good condition by the year 2005.

Phasing out of the cooperative farming program would allow the bottoms along the Missouri River to revert to a natural riparian community, benefiting some wildlife species but adversely impacting others.

Mule deer habitat in the big sage-greasewood-grassland, ponderosa pine-juniper, and grassland-deciduous shrub types would be improved 34 percent by the year 2005 as a result of increased forb and shrub levels (Appendix 14). This would mean increasing the habitat's ability to support an over-wintering population to 6-10 deer/sq. mile (FWS 1978). Elk use large areas off the refuge which contain essential habitat components beyond CMR's control.

Overall habitat quality would increase 16-105 percent depending on wildlife species evaluated (Appendix 14). The reduction in grazing to accomplish this increase in habitat quality might result in lowering of habitat quality on private lands if landowners increase stocking rates on these lands to compensate for the loss of AUMs on the refuge.

Increasing vegetation along continuous and intermittent streams would reduce siltation and stabilize stream flows which could benefit the reservoir fishery.

Impacts from predator and animal control would be the same as the No Action alternative.

Range communities would improve from the proposed forage allocations. Approximately 25 percent of the grazed portions of the refuge would be in excellent condition by 1990, and 35 percent in excellent condition by the year 2005. Fair condition range would be reduced from the present level of 7 percent to an estimated 3 or 4 percent because of reductions in livestock on overgrazed allotments, particularly in the Big Dry area. Grazed portions of the refuge in poor ecological condition (about 1.1 percent) would not change appreciably, as most are commonly associated with prairie dog towns or are flood plains which are periodically disturbed by floods or ice jams. Owensby et al. (1973) found that little change occurs on poor condition range after 10 years. They estimated it would take 40 years for overgrazed range to attain excellent condition under complete rest in a precipitation zone of 25 inches annually. It is therefore unlikely that the poor condition range on the refuge would be significantly enhanced by the year 2005.

Although overutilized areas would be reduced under this alternative, some of these sites would be present as long as cattle are grazed on a seasonal or year-long basis. Areas with no livestock grazing or those having rotation systems or prescription grazing should not have significant distribution problems because of a periodic rest cycle or total rest to facilitate vegetal response.

The proposed livestock reductions would help limit most livestock grazing to areas with a slope gradient of less than 20 percent and within one mile of water. Mackie (1970) observed that 90 percent of livestock use in the Missouri breaks was within one mile of water, and over 80 percent occurred on slopes of less than 10 degrees gradient. Allocations of forage to livestock were made taking these factors and soils limitations into consideration to eliminate range overuse by livestock on primary ranges (Appendix 15). This would provide a greater amount of forage per animal on these primary livestock ranges, reduce the need for them to range further for forage, and should generally promote livestock gain.

Light stocking levels proposed by this action would have the effect of maintaining productivity and a diversity of habitat conditions. Van Poollen and Lacey (1979) reviewed pertinent literature with respect to grazing systems and intensities on western ranges:

> "Mean annual herbage production increased by 13 percent when grazing systems were implemented at moderate stocking intensities. Increases were greater (35 and 27 percent) when continuous livestock use was reduced from heavy to moderate and moderate to light, respectively. This indicates that adjustments in livestock numbers have a greater effect on herbage production than do grazing systems."

Grazing systems evaluated and compared with continuous use included rotation, deferred, rest rotation, and deferred rotation systems under moderate stocking levels (40-60 percent utilization of forage).

Klipple and Costello (1960) in a 13-year study provided an appropriate description of the effects of light grazing by livestock on vegetation.

> "Light grazing, as defined in this study, was characterized by distinct patches of grazed vegetation surrounded by areas of almost ungrazed vegetation. Grazed areas had as much as 50 percent of the current growth removed. Ungrazed plants of the highly palatable species were easily found, and conspicuous stubble remained on the grazed plants. Plants of low palatability, such as three-awns, broom snakeweed, rubber rabbitbrush, and slender bush eriogonum, seldom showed grazing use."

This type of grazing by domestic livestock would help provide the diversity of habitat conditions needed to achieve desired wildlife populations and diversity of species.

Klipple and Costello's description of the effects of light grazing coincides with a description of the effects of bison grazing on the National Bison Range, Montana (R. Brown personal communication). Based on this, forage allocation under this alternative could approximate grazing by bison.

Little or no livestock grazing would occur on sites more distant from water or on steeper terrain. Hardwood shrubs on these more remote areas would be able to complete their growth cycle without being affected by livestock trampling and grazing. Resultant livestock-wildlife stocking levels would tend to be somewhat in line with Mackie's (1970) management considerations for a joint use range situation, where livestock are favored on the more level ranges close to water, and wildlife are favored on steeper, more inaccessible terrain having good security cover or in areas more remote from water.

In some portions of the refuge, a scattered pattern of landownership exists between federal, state, and private land. The management of CMR will be coordinated and integrated, where feasible, with the objectives of other federal agencies, state agencies, and private landowners on and around CMR.

The Proposed Action alternative would tend to produce a diversity of habitat conditions. The desired vegetative components of residual cover and enhanced shrub production would be produced on a larger percentage of potentially suitable sites, but use patterns by livestock would ensure maintenance of habitat conditions for wildlife species having less stringent residual cover and shrub requirements. The result of grazing used as a management tool would be to maintain or alter habitat to benefit a particular wildlife species.

Grazing at the proposed levels would maintain vegetative productivity and vigor, but would also provide for the necessary residual cover to meet requirements of ground nesting birds and small mammal species. Forage equivalent to approximately 69,000 AUMs would be made available for wildlife for consumption as food or for cover requirements by 1990. The refuge would be managed under the philosophy that light livestock grazing levels are not detrimental to wildlife populations (Appendix 16).

Lower grazing pressure by livestock would provide enhancement of vegetative resources in some deteriorated areas. An increase of about 5,000 AUMs of forage should be realized by the year 2005 from the improved range conditions and would be available to wildlife.

Mackie (1970) felt that the onset of livestock grazing in the Missouri breaks should be delayed until mid-May when plant growth is more advanced. Smith (1979) supported Mackie's discussion in regard to plant responses to grazing and range readiness. Some disturbance with wildlife nesting and fawning activities could be expected by allowing onset of livestock grazing in mid-May. Under the light livestock use proposed by this alternative, these disturbances are not expected to be significant. If conflicts do occur, adjustments in grazing seasons will be made as required to minimize conflicts with wildlife. Fall and winter livestock use on range grazed by elk and deer also increases livestock-wildlife competition for forage. Such use has been identified as a problem in several allotments. Implementing later turn-in and earlier turn-out dates for livestock would mean a better opportunity to enhance habitat conditions for wildlife by allowing a higher state of range readiness in the spring before onset of livestock grazing and less competition for forage between livestock and wildlife on winter ranges.

Reduced grazing levels may have the tendency to open sagebrush stands and reduce canopy cover of sagebrush because grasses in the stand would receive less grazing pressure. Grasses have root systems better adapted to catching infiltrating water, and under normal livestock grazing pressures, grasses are selectively taken in preference to the relatively unpalatable sage. On portions of the refuge, heavy seasonal grazing would eventually result in changes in plant species composition favoring sagebrush. Under the Proposed Action, grazing would be utilized to help maintain sagebrush communities if they begin to decline to benefit such species as mule deer, pronghorns, and sage grouse.

Several existing reservoirs would be enlarged and rehabilitated. This would enhance conditions for shorebirds and waterfowl. Some new fences would be constructed along the refuge boundary to control livestock and help attain desired vegetative cover levels. Some minor riparian areas across the refuge lack good shrub communities; construction of a minimum of six miles of fence would help alleviate this situation. Habitat quality would be expected to increase from fair to good as a result of this and other proposed treatments.

New recreation areas and related developments would be prohibited near sensitive wildlife habitat, and incompatible activities would be curtailed during critical nesting and breeding seasons. Most recreational development would occur at areas already disturbed by facilities.

RECREATION AND CULTURAL RESOURCES

Compared to the others, this alternative would contribute an intermediate amount toward meeting national and regional recreation requirements and needs identified in the Nationwide Outdoor Recreation Plan (Bureau of Outdoor Recreation 1973) and Montana Statewide Comprehensive Outdoor Recreation Plan (Montana Department of Fish and Game 1978). Recreation objectives identified for CMR would be satisfied.

Introduction of endangered or unique species such as peregrine falcons, black-footed ferrets, swift fox, and bighorn sheep would increase the diversity of animals available for wildlife-oriented recreation. The rare occurrence of these species, and the equally rare opportunities to view them anywhere else, would provide a once-in-a-lifetime opportunity for many visitors. Introduction of peregrine falcons would necessitate restriction of human disturbance during the breeding season (Snow 1972).

Improvement of habitat would increase the numbers of wildlife that would be observed or taken. Demand for hunting would increase as game populations increase; however, with bowhunters it might not be possible to meet the demand, as it is not presently possible to do on some areas because of other limiting factors, such as disturbance in Montana State Hunting Units 631 and 632.

In addition to the cultural surveys that would be undertaken, other benefits would accrue due to the provision of a historic tour route and interpretation of numerous historical, archeological, and paleontological features throughout the refuge. Sites eligible for inclusion on the

National Register of Historic Places would be identified, and areas having significant values would be designated as special districts or natural landmarks.

The proposed forage allocations would provide enhanced range conditions on a refuge-wide basis. This would enhance the aesthetic quality of the refuge and provide a higher quality recreational experience as well as a greater opportunity to recreate. Prescribed burning would result in a lowering of visual quality for 1-5 years.

The water pipeline and troughs that would be constructed about one mile from the present wildlife tour route on the west end of the refuge would help attract livestock concentrations away from the area and improve wildlife viewing potentials.

Increases in visitation would occur due to provision of various interpretive facilities, including visitor contact stations, a sail-powerboat tour route, backcountry-nature trails, and interpretive programs and displays. These uses would enable the public to acquire a better understanding of and appreciation for wildlife and related resources. The only new area to be developed would be at Fourchette Bay which would provide access and facilities for recreationists on the northwest end of the refuge. About half the additional use associated with this site is expected to be wildlife and wildlands-oriented. There would be a small increase in vehicular travel over roads leading into the refuge across BLM land and some additional use of BLM lands for recreation. Improving roads would provide better access for fishermen, hunters, and other recreationists.

Establishing scattered access sites to the reservoir over a large area would more evenly distribute use, reducing congestion at some existing sites and improving the quality of the recreation experience.

Development and use of roads and permanent recreation facilities would reduce available wildlife habitat. Perry and Overly (1977) found that vehicular use of all roads in the Blue Mountains of Washington (main, secondary, and primitive) had a significant detrimental effect on use by big game to a distance of one-half mile as compared to control plots where no roads were located. Proper planning of road systems on the refuge would serve to minimize potentially detrimental impacts to wildlife.

Proper planning of public use resulting from a management study of the Slippery Ann area would ensure a high quality recreation experience while minimizing management problems and impacts on wildlife. By permitting landing of aircraft only at specified locations on the refuge, there would be no significant conflicts with wildlife or recreationists.

SOCIOECONOMICS

Grazing would be reduced from 60,108 to 40,482 AUMs by 1990. This represents a decrease of 19,625 AUMs or about 33 percent. Between 1990-2005, grazing activities would be increased slightly from 40,482 to 40,628 AUMs. This increase would result from proposed land acquisition on CMR. The self-furnished AUMs on these lands would be converted to federal AUMs as the tracts are acquired. The direct effect of the AUM reductions to 40,628 AUMs is estimated at a negative $347,000 in sales. This direct effect would be sustained almost entirely by permittees who use the refuge. The possible consequences of implementing the Proposed Action upon individual permittees who graze livestock on the refuge are shown in Appendix 10.

As Appendix 10 discusses, while the average impact under the Proposed Action to the ranchers would be about 3 percent, eleven ranchers, who have substantially higher than average dependency, will be impacted more severely.

Table 13 shows the project levels of annual visitation for years 1990-2005. Direct and indirect annual economic effects in terms of sales are +$162,911 for 1985 and +$488,520 for year 2005. This translates into a gain of 4 workers per year in the 1978-90 period, and an additional 11 workers per year in the 1991-2005 period.

The net direct plus indirect effects (combination of grazing losses and recreation gains) of the Proposed Action is a loss of $763,579 in sales and 9 workers annually in the 1978-90 period. The loss in sales is $451,320 and employment is 2 workers annually in the years 1991-2005. Both result in a change in employment of less than 1 percent.

Table 13 summarizes the noneconomic effects which would result from implementation of the Proposed Action.

There are about 800 acres of cropland on the refuge used primarily for hay production. Assuming a hay price of $50 per ton and a 1 ton per acre yield, gross revenue would total $40,000 per year. With production costs at $30 per ton, net revenue would total $16,000 per year. If the loss of this feed required importation of an equal amount of livestock feed, the cost per ton would be about $16 more than local prices, thus, creating an added cost to producers of about $12,800 per year.

Table 13. Noneconomic effects, Proposed Action alternative, Charles M. Russell National Wildlife Refuge, Montana.

	Present situation (1978)	Proposed Action	
		1990	2005
Habitat quality[1]			
Sharp-tailed grouse	4.6	5.8	7.2
Mule deer	5.6	6.8	7.2
Pronghorns	5.2	6.5	7.4
White-tailed deer	5.4	6.5	7.4
Elk	6.0	7.0	7.6
Waterfowl	3.4	4.2	7.0
Development			
Burn (acres)	0	1900	7700
Plant trees (acres)	0	0	0
Plant shrubs (acres)	0	100	500
Soil ripping (acres)	0	0	0
Ponds (acres)	0	3	3
Fences (miles)			
Exclosure[2]	0	2	6
Boundary (aprx.)	50	91	97
Interior	Unknown	21	21
Water projects (No.)			
Ponds (aprx.)	150	153	153
Troughs	13	23	23
Springs	0	0	0
Visitor days			
FWS	64,000	70,000	73,000
Other	293,000	326,000	360,000
Total	357,000	396,000	433,000
Forage (AUMs)			
Wildlife	50,000	69,000	74,000
Livestock (active)	56,524[3]	40,482	40,628
Total	106,524	109,482	114,628
Range condition (%)			
Poor	1	1	1
Fair	7	7	4
Good	74	67	60
Excellent	18	25	35

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[1] 0-2.5 = poor, 2.6-5.0 = fair, 5.1-7.5 = good and 7.6-10.0 = excellent.

[2] A precise estimate of acres enclosed/mile of fence is not provided due to presently undetermined topography and shape of exclosure. A general rule of thumb is 40 acres enclosed per mile of fence.

[3] This figure represents active AUMs; 3584 AUMs are inactive totaling 60,108 AUMs.

ALTERNATIVE C

(Intensive Wildlife Management)

SOILS-WATERSHED

Fire management practices would result in the opening of some coniferous forest stands to increase grass, forb, and shrub levels to retard runoff and soil loss. Eichhorn and Watts (1974) observed that the evergreen litter and tree overstory of unburned sites are less effective in reducing erosion than nontree vegetation on burned sites. Planting and exclosures would provide more residual cover and shrub communities which would also retard runoff and erosion.

Forage allocations under this alternative would considerably enhance soils and watershed. Livestock grazing would total about 27,000-30,000 AUMs and would remove considerably less forage compared to present levels. This would provide more litter cover on traditional primary livestock areas. Water infiltration into the soil would be higher, soil compaction and runoff lower, and bare soil exposed to wind erosion considerably less. These adverse impacts are cumulative over the years and continue from year to year, although they may be lessened by rest from grazing.

Marginal sites that are highly fragile, such as thin breaks, badlands, and shale would receive little or no use, and soil erosion would be minimized. Any use on these areas by livestock tends to increase soil or parent material loss because of vegetation cover removal and livestock movements (W. Larsen personal communication).

Approximately 300 miles of boundary fence would control livestock movements within the refuge and improve range conditions and, therefore, soils and watershed.

Ripping of all suitable panspots and dense clay range sites outside proposed or designated wilderness areas would improve watershed quality and reduce soil erosion through increase plant and litter cover. Ripping would allow greater water infiltration into the soil, making it available for plant uptake. This increased water supply would enhance site productivity and lower amounts of exposed soil.

Soil productivity would be considerably enhanced because of reductions in rates of soil erosion and soil ripping operations. Increased plant and litter cover resulting from improved range conditions and soil ripping operations would provide nearly optimal watershed conditions for the whole refuge.

WILDLIFE HABITAT-RANGE RESOURCES

The general grazing pattern proposed in this alternative would probably keep prairie dogs and their associated species at their present level (C. Knowles personal communication). Knowles inferred that maintenance and expansion of prairie dog populations is dependent upon man-caused disturbances such as livestock grazing, reservoirs, holding corrals, or wells. This is supported by McEneaney and Jensen (1974) and BLM (1979), who noted that the presence of prairie dogs is most likely a symptom, rather than a cause, of deteriorating range. Prescription grazing would be employed as necessary to manipulate habitat for prairie dogs to maintain them within the limits prescribed in the objectives for this species.

Lack of residual vegetation for cover and food is limiting to several species of wildlife. Using prescription grazing as a tool would increase residual vegetation to provide nesting and hiding cover and forage for wildlife.

The limited livestock grazing allowed would result in an increase of residual cover to 8-10 inches on 80-90 percent of the suitable sites by 1990. This would provide adequate nesting cover (Christenson 1971, Sisson 1976) for an optimum number of sharp-tailed grouse in the springtime (30-35/sq. mile). It would also benefit a wide range of species described under the Proposed Action alternative.

Eliminating livestock grazing, except on a controlled basis, would provide more forbs for pronghorns and mule deer and increase this aspect of habitat quality for both species by 30-45 percent (Appendix 14). According to Mackie (1970), forbs constitute an important component in the summer and fall diet of mule deer in the Missouri River breaks. Cole (1956) reported similar findings for pronghorns. Mackie (1970) also reported that forbs comprised an important component in diets of cattle during spring, summer, and fall.

Increased grass and forb production in sagebrush communities would be expected under light grazing with a gradual "opening" of the stand as the shrubs mature and die. This would be detrimental to wintering populations of pronghorns, sage grouse, and mule deer. However, prescription grazing by livestock early in the spring (April 15-June 15) would be employed for two or three years or longer as required to reverse any trend toward grass and forb dominance in a stand. Livestock would select the palatable grasses and forbs over sage, thus providing the sage with a competitive edge in succeeding years. Some lowering of overall wildlife habitat quality (residual cover levels) may occur in pastures subjected to such livestock grazing in a given year.

Wildlife species such as chestnut-collared longspurs, prairie horned larks (Owens and Myres 1973), and mountain plovers (Smith 1940), which benefit from lower quality residual cover levels, could be detrimentally affected by this alternative. However, prescription grazing would be employed to provide habitat conditions to benefit these species.

Key shrubs are lacking for use as food, cover and perches, particularly for sharp-tailed grouse. Prescribed burning on approximately 15,000 acres, planting of suitable shrubs on approximately 3000 acres, construction of temporary wildlife exclosures in key hardwood draws, and prescription grazing would improve important shrub communities. Prescription grazing alone would probably not provide for sufficient response by shrubs within the desired time frame, especially since shrubs are limited in distribution at present. The proposed planting and burning would provide for establishment of shrubs on a substantial portion of CMR. Eventual expansion through natural reseeding from the planted or burned areas would help meet objectives for wildlife in terms of shrub quantity and quality. Ninety percent of the potentially suitable hardwood draws would have desired shrub densities by the year 2005. Because shrub responses are slower than effects of reduced grazing upon herbaceous species, continual improvement in shrub quality would occur for another 40-50 years.

Several other species would benefit from burning and planting. They include sharp-tailed grouse (improved roosting cover, Sisson 1976), mountain bluebirds (grass and open areas, Balda 1975, Miller 1970), and porcupines (improved ground cover, Costello 1966). Prescribed burning combined with prescription grazing would improve sharp-tailed grouse and mule deer habitat to meet or exceed wildlife habitat objectives for these species before the year 2005.

Most of the river bottoms along the Missouri and Musselshell rivers are presently excluded from livestock use. They should be near their full potential by 1985. It is estimated that 80 percent of potentially suitable areas in these drainages would be at or above desired levels for tree and shrub composition by the year 2000 for the benefit of a variety of wildlife using the bottoms. Vegetation around stock watering reservoirs should have the 8-10 inches desired residual cover on 75-80 percent of suitable areas by the year 2005. This alternative would provide the fastest response for recovery toward climax, short of artificially reseeding affected areas and totally resting them.

T. Planz (personal communication) estimated that waterfowl production at UL Bend alone would be increased from 200 to 2,000 birds with intensive management. No figures are available for the entire refuge, but it would be expected that similar results could be achieved on a limited basis at other areas of the refuge. Some sites would be slower to respond because of the present degree of dominance by increaser and invader plant species.

All smaller streams with adequate water sources should have substantially improved riparian zones. This would be assisted with temporary fences to exclude wildlife where necessary.

More intensive farming in conjunction with improved riparian areas would provide optimum food and cover levels for many species of wildlife. Mule and white-tailed deer, raccoons, sharp-tailed grouse, ring-necked pheasant, turkeys, mourning doves, waterfowl, and most all other wildlife species would take advantage of these farm plantings to supplement their food supply. It is anticipated that elk would be drawn to these areas and reduce their use of adjacent private crops.

Extensive tree planting would provide improved security cover and reduce displacement of elk as a result of human and livestock disturbance. Tree planting would primarily be done to improve habitat in Valley County where tree cover is presently considered to be inadequate.

Overall habitat quality could be expected to increase 25-165 percent over the 20-year period, depending upon the species evaluated (Appendix 14). The increase in habitat quality and capability to support wildlife which would occur as a result of reductions in livestock grazing may result in lowering of habitat quality on adjacent lands if private landowners increase stocking rates of their lands to compensate for loss of AUMs on the refuge.

Improving vegetation on continuous and intermittent streams would reduce siltation and stabilize stream flows. Establishment of spawning habitat on Fort Peck Reservoir could make fish reproduction possible. This could reduce the need for stocking operations and increase the fishery resource. Impacts from coyote and prairie dog control would be the same as the No Action alternative.

Livestock grazing would be based primarily upon known plant responses to grazing levels and seasons of use. Spring-summer use in alternate years would provide stimulation of vigor and production from grazing, with rest periods providing storage of food reserves by plants. Grazing in this manner would provide a significant degree of enhancement of climax plant species (Smith 1979). Smith (1979) and Hormay (1980) indicated that two years of rest following grazing is necessary for enhancement of vegetative cover on the refuge. The desired results to be achieved in terms of residual cover and habitat quality for wildlife would determine the extent of deviation from the prescription grazing system described above. For example, several years of moderate to heavy grazing might be required to promote habitat conditions for some wildlife species.

Grazing on state and private inholdings would remain at present levels. By the year 2005, many state and private inholdings would be acquired by exchange or purchase and converted from self-furnished to federal AUMs. These AUMs would then be changed to a prescription basis or retired. By the year 2005, most grazing would be on a prescription basis, except for remaining inholdings. Livestock levels would probably fluctuate between 27,000-30,000 AUMs. By itself, prescription grazing would not significantly enhance habitat quality over grazing levels in the Proposed

Action. The proposed intensive treatments of planting, burning, and ripping would be the primary contributing factors involved in improving wildlife habitat.

Approximately 87,500 AUMs would be allocated to wildlife for food and cover requirements by 1990, with about 107,000 AUMs available to wildlife by the year 2005.

This pattern of grazing might eliminate use by small, family-owned ranching operations which depend heavily upon AUMs supplied by the refuge (Appendix 10). It would mean elimination of most allotments in their present form. Some larger operators would continue in a semblance of their former status. Livestock operations under this alternative would conceivably be run by 15-20 large ranches or corporations which are not highly dependent upon federal lands. Individuals, ranching operations, or associations having a few to several hundred AUMs would possibly be eliminated in favor of large scale operations desiring to utilize a minimum of 1,000 or more AUMs during the grazing season. It is estimated that approximately 13 operators would be forced out of business by this alternative (Appendix 10). Additional economic information is not available, and economic consequences could be greater, as stated in the Proposed Action alternative.

Virtually all the desired areas on the refuge would approach excellent range condition by the year 2005. Poor and fair condition range would take substantially longer to reach excellent condition. Owensby et al. (1973) reported findings from a Kansas study where little improvement was noted on deteriorated ranges after ten years following fencing. The authors estimated recovery time to excellent condition to be 40 years, even with complete rest and in a precipitation zone of 25 inches annually. Gradually, however, even this depleted range would be restored to its full potential if desired. Wildlife objectives might dictate that these areas be maintained at a lower range condition.

All existing grazing systems would be drastically affected by this new grazing program. The program would employ a type of grazing which would benefit soils, watershed, and wildlife values.

Prescription grazing would be used as necessary to maintain habitat conditions at desirable levels to benefit species such as mule deer, sage grouse, or black-tailed prairie dogs which have habitat needs of other than climax vegetation. Species such as sharp-tailed grouse would benefit from the general grazing pattern.

The graze-rest cycle would provide the optimal situation for shrub enhancement. This alternative, together with shrub plantings on 3,000 acres and prescribed burning on 15,000 acres, would help produce maximum shrub enhancement within a minimum period of time. It is estimated that 90 percent or better of the suitable sites would be in the desired condition within 50 years, and 75 percent of suitable areas would be at or above desired levels for shrubs by the year 2005. Limited grazing and proposed shrub management practices would increase the habitat's ability to support an over-wintering population from 6-15 deer/sq. mile.

Bison would also be introduced into the UL Bend area in suitably fenced areas and replace cattle as a principal large grazer.

Range developments to be implemented include mechanical ripping of as much as 38,000 acres of dense clay and panspots range sites. This acreage is an estimate of those areas lying outside designated wilderness which have potential for treatment because of salt content, low water infiltration rates, and sparse vegetation. A two- to five-fold increase in vegetative biomass is possible by ripping on favorable sites (C. Clark personal communication). Wight et al. (1978) reported an increase in herbage production of 165 percent, with 10 percent more plant-available soil water on panspots sites in southeast Montana following ripping of the soil surface. J. Rogers (personal communication) stated similar results are normally obtained through breaking the surface of panspots by ripping or furrowing. These improvements are expected to occur on the 38,000 acres proposed for ripping. The perched water table often present on these sites would be eliminated; water would be allowed to percolate through the soil profile and would help flush out accumulated salts; increased quantities of water would be available for plant uptake. Greater site productivity would occur as a result. Ripping this acreage would increase the carrying capacity of the refuge by a minimum of 3,000 AUMs.

About 300 miles of boundary fence would be constructed. This fence would limit livestock access onto the refuge and maintain desired levels of livestock to accomplish grazing objectives for habitat improvement. Construction of a boundary fence might impede some wildlife movement, but this would be partially compensated for by removal of numerous existing interior fences.

New recreation areas and related developments would be prohibited near sensitive wildlife habitat, and incompatible activities would be curtailed during critical nesting and breeding season. Most recreational development would occur at areas already disturbed by facilities. Eliminating private cabins and establishing wildlife habitat on these areas would improve conditions for wildlife on the refuge.

RECREATION AND CULTURAL RESOURCES

Compared to the others, this alternative would contribute somewhat less than the Proposed Action and No Grazing alternatives toward meeting national and regional recreation requirements and needs identified in the Nationwide Outdoor Recreation Plan (Bureau of Outdoor Recreation 1973) and the Montana Statewide Outdoor Recreation Plan (Montana Department of Fish and Game 1978). It would still meet recreation objectives identified for CMR.

Increases in wildlife accompanying this action would provide some additional recreation opportunities in the form of viewing, photographing, and hunting. The establishment of bison on the refuge would restore a sight familiar to the area in the 1800's and provide the visitor with a living reminder of the animals that once flourished here. Introduction of peregrine falcons would necessitate restriction of human disturbance during the breeding season (Snow 1972).

Limited conflicts between recreation users and livestock would decline as livestock levels are reduced. Livestock damage to culturally or historically significant areas would decrease. There would be little interference between camper-hunters and livestock on some recreation areas. Because bison would be contained in fenced areas, there would be no conflicts with recreationists or cultural resources.

Ripping of dense clay and panspots range sites would have an adverse effect on visual resources for a minimum of 3-5 years. Prescribed burning would result in a lowering of visual quality for 1-5 years.

Visitors would be able to view bison, and limited hunting opportunities would be possible as the population produced a harvestable surplus.

Due to increased use of refuge roads, there would be corresponding increase in vehicular travel over roads leading into the refuge across adjoining BLM and private land. Proper planning in terms of a road system transportation plan would minimize potentially detrimental wildlife impacts. As a result, some additional use of BLM lands for recreation would occur. In addition, private landowners would be expected to receive increased demand from recreationists seeking to travel through their land or hunt. Reductions in livestock grazing levels on the refuge would probably result in a less tolerant attitude on the part of area ranchers toward any increased recreation use on adjacent private lands and a corresponding increase in closure of these lands to public use.

Eliminating private cabin developments and restoring the land to wildlife habitat would reduce the number of people recreating on the refuge. The Service and the Corps of Engineers will adhere to National Environmental Policy Act and P.L. 91-646 in the event any cabin leases are terminated before expiration date. Under the provisions of these laws, displaced cabin owners are entitled to just compensation for their losses, including costs of relocations.

Except for the lesser degree of recreational development and use anticipated with this alternative, there would be about the same types of impacts as envisioned with the Proposed Action alternative. There would be some exceptions, however, since only nature trails and no backcountry trails would be established. Also, there would be less impact on cultural resources since damage by livestock would be reduced and there would be less public use.

SOCIOECONOMICS

This alternative would decrease annual livestock AUMs by 37,285 or as much as 67 percent during 1978-1990 period.

Such a reduction would cause an annual loss of $725,000 in sales to the CMR ranchers, and a reduction in hired labor of 2.8 workers. This represents a 6.8 percent average reduction in gross income or sales to the ranchers. This alternative would have a larger than average adverse impact to the eleven high-dependency ranchers on the CMR. The direct plus indirect effects on sales and employment is nearly 2 million dollars and 27 workers. While the absolute amounts are large, the regional significance is quite small.

Appendix Table 17a shows the annual visitation by category for the years 1990-2005. Direct plus indirect effects of the losses in recreation visitation (compared to the No Action alternative) are annual losses of $162,911 in sales and 4 workers in the 1978-1990 period, and annual losses of $1,086,072 in sales and 24 workers in the 1991-2005 period.

The net total effect (sum of livestock and recreation direct and indirect effects) is an annual 2 million dollar loss in sales and 31 workers in the 1978-1990 period, and 2.7 million dollars and 48 workers in the 1991-2005 period. While in absolute terms the intensive wildlife management action has the largest negative impacts, they are still regionally insignificant (less than 1 percent change).

Table 14. Noneconomic effects, Intensive Wildlife Management alternative, Charles M. Russell National Wildlife Refuge, Montana.

	Present situation (1978)	Intensive Wildlife Management	
		1990	2005
Habitat quality[1]			
Sharp-tailed grouse	4.6	6.8	8.0
Mule deer	5.6	7.3	8.0
Pronghorns	5.2	6.6	7.1
White-tailed deer	5.4	7.0	8.1
Elk	6.0	7.5	8.0
Waterfowl	3.4	7.0	9.0
Development			
Burn (acres)	0	3,800	15,000
Plant trees (acres)	0	6,250	25,000
Plant shrubs (acres)	0	800	3000
Soil ripping (acres)	0	0	38,000
Ponds (acres)	0	225	900
Fences (miles)			
Exclosure[2]	0	13	52
Boundary (aprx.)	50	50	450
Interior	Unknown	0	0
Water projects (No.)			
Ponds (aprx.)	150	160	210
Troughs	13	13	13
Springs	0	0	0
Visitor days			
FWS	64,000	69,000	107,000
Other	293,000	321,000	333,000
Total	357,000	390,000	404,000
Forage (AUMs)			
Wildlife	50,000	87,500	107,000
Livestock (active)	56,524[3]	22,823	26,833
Total	106,524	110,323	133,833
Range condition (%)			
Poor	1	1	1
Fair	7	7	4
Good	74	67	15
Excellent	18	25	80

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[1] 0-2.5 = poor, 2.6-5.0 = fair, 5.1-7.5 = good and 7.6-10.0 = excellent.

[2] A precise estimate of acres enclosed/mile of fence is not provided due to presently undetermined topography and shape of exclosure. A general rule of thumb is 40 acres enclosed per mile of fence.

[3] These figures represent the active AUMs; 3584 AUMs are inactive totaling 60,108 AUMs.

ALTERNATIVE D

(Multiple Use)

SOILS-WATERSHED

Fire management practices would have the same consequences as the No Action alternative.

Temporary livestock reductions in several allotments plus soil ripping practices would provide moderate enhancement of soil productivity in treated areas. Areas not receiving these grazing or mechanical treatments could expect a slight improvement in conditions. Watershed quality enhancement would show similar trends.

An initial drop of about 4,500 active livestock AUMs below present levels would occur in response to a need for enhancing present range conditions within several allotments. These decreases would occur primarily in the Big Dry Arm portion of the refuge where the most serious range condition problems are present. The effect of this temporary reduction would be to help eliminate an estimated 50 percent of the deteriorated range conditions on the refuge. Overland water runoff would be substantially lowered on these areas because of increased plant and litter cover, with soil erosion lowered as a result. Expected increases in litter and plant cover would be somewhere between present levels and those expected under the Proposed Action alternative. This in turn would place erosional rates for this alternative between the No Action and Proposed Action alternatives. Increased plant and litter cover would allow cycling of more minerals and nutrients through the soil.

The 38,000 acres proposed for ripping would have higher productivity, as previously discussed under other alternatives. Additional water developments, fencing, and implementation of new grazing systems geared to specific allotment needs should serve to improve soils and watershed conditions primarily as a result of increased plant and litter cover which will reduce soil erosion and overland runoff. Although some proponents of rest-rotation grazing might point out that implementation of such systems refuge-wide would improve soils and watershed, an examination of available literature does not reveal a clear-cut distinction between this and other grazing systems. Gifford and Hawkins (1976) evaluated nine separate studies that reflected impacts of various grazing systems, including rest-rotation, on plant and litter cover on watersheds. A more realistic situation would require evaluation of allotment deficiencies and implementation of grazing systems designed to overcome those specific deficiencies.

Soil resources would be more adversely impacted by this alternative as a result of recreational uses than by the Proposed Action due to the significantly greater amount of visitation expected to occur. Increased vehicular traffic in the backcountry areas of the refuge could result in higher rates of erosion and rutting of access roads.

WILDLIFE HABITAT-RANGE RESOURCES

Under this option, prairie dog control would have a detrimental effect on the prairie dogs through direct reductions in populations. There would be indirect effects on various species dependent upon dog towns for portions of their life requirements; burrowing owls would have fewer home sites and raptors and terrestrial predators a smaller food base. Potential dens for black-footed ferrets would be eliminated.

Peregrine falcons would benefit as a result of slight increases in residual cover to increase suitable habitat for prey species.

There would be some competition between bighorn sheep and cattle. This would be especially detrimental if sheep were confined to a limited range also used by cattle, as in fall-winter use allotments where forage might be in short supply.

Lack of residual vegetation for cover and food is limiting to several species of wildlife. New grazing systems, seasons of use, temporary livestock reductions, and habitat manipulation practices would provide a low to moderate amount of improvement in range and wildlife habitat quality across CMR. A smaller percentage of the refuge would remain in excellent condition as range improvement programs provide increased livestock access to formerly inaccessible areas. Areas of overuse would improve condition-wise as new improvements allow for better livestock distribution.

An estimated 50 percent of all potentially suitable sites on the refuge would have the desired 8-10 inches of residual cover by the year 2005 as a result of temporary AUM reductions to enhance range condition and various other treatments proposed under this action. This would provide suitable nesting sites for sharp-tailed grouse and provide spring breeding bird densities of approximately 10 birds/mi2 and benefit several other species as described under the Proposed Action alternative. It would help improve overall sharp-tailed grouse habitat from fair to good condition. Areas that would not have 8-10 inches of residual cover include those key livestock areas within one mile of water on level to moderate slopes that are used on an annual, seasonal basis during summer months. These areas would have significantly fewer forbs and grasses than ungrazed portions of the refuge.

Residual and emergent vegetation in and around ponds located on the refuge would continue to receive heavy use under livestock grazing during warm, dry weather. Pond development at UL Bend would substantially increase waterfowl population levels.

Livestock grazing practices would be expected to result in maintenance or possibly a slight expansion of existing sage communities to benefit pronghorns and sage grouse, which, according to Wallstead (1971), Eng and Schladweiler (1972), and Bayless (1969), require areas of dense big sage (20-30 percent canopy coverage) for use throughout the year. An estimated 50 percent of the allotments having habitat shrub potential levels of good-excellent would reach these levels by the year 2005.

Riparian areas grazed on an annual, seasonal, or continuous basis would continue to receive heavy livestock use, and only fenced areas would develop riparian communities of value to wildlife. Limited improvements in shrub communities would be realized on allotments where rotation systems of grazing are implemented.

Key shrubs are lacking for use as food as well as cover and perches. Burning to enhance shrubs on 400 acres by 1990 and a total of 1,500 acres by the year 2000, plus planting shrubs on 300 acres by the year 2005, would result in slight increases in shrubs. This would provide food and cover for mule deer but no significant changes in the habitat's ability to support an over-wintering population of mule deer.

Overall habitat quality would increase 4-120 percent over the 20-year period, depending upon species evaluated (Appendix 14). Wildlife objectives would not be reached.

Habitat quality, and therefore capability to support wildlife, would be increased only slightly over the present situation for most species. This situation, coupled with some increases in livestock grazing on the refuge, would mean little or no change in quality of habitat on adjacent lands.

The small improvement in riparian habitat would not significantly improve stream flows in continuous and intermittent streams or the fishery resource of the reservoir.

Rough terrain on the refuge limits effectiveness of fixed wing aircraft predator control. The use of helicopters would be more efficient but is also limited to some degree by topography. Aerial hunting combined with other types of control would reduce coyote populations on an annual basis, but the effects would not be expected to permanently alter the coyote population. Impacts from prairie dog control would be the same as the No Action alternative. Coyote control for protection of other wildlife would have no significant impacts on coyote populations. Other small mammal control would have the same impacts as the Intensive Wildlife Management alternative.

Forage allocations would provide enhancement of those allotments in deteriorated condition by substantial livestock reduction until improvements occur. Other allotments in good to excellent ecological condition would receive few, if any, reductions. Livestock AUMs would be increased as range conditions improve; initially approximately 50 percent of the AUMs in each allotment would be allocated to wildlife. Any increases in forage production resulting from improved range conditions would be allocated to resource values for which the greatest need exists (livestock, wildlife, watershed). Range objectives would not be achieved with this alternative as wildlife objectives would not be realized.

Approximately 18 allotments would receive increases in use. About 7,000 AUMs of forage would be available for livestock and 4,500 for wildlife on the UL Bend NWR that is presently ungrazed. Total federal livestock AUMs would be about 52,000 active by 1990. Improved range conditions and range improvement programs would allow an increase in livestock use to a minimum of 61,260 active federal AUMs by the year 2005. This level would be increased as range conditions improve or where it is demonstrated that wildlife needs are being met. State and private land would be allowed additional AUMs, as conditions permit. It is felt that these areas are nearly stocked to capacity at present, and any increases in AUMs would be small.

Temporary reductions in livestock use in deteriorated areas would help shrub production and establishment. Under seasonal or continuous grazing, which would be retained for most allotments, no significant increases in shrub production would occur, and trampling of shrubs would continue to be a problem.

Approximately 12 additional allotments under seasonal, continuous, or yearlong use would be put into rotational grazing systems. Fencing and water developments would be constructed in these and other allotments as needed.

Many of the remaining allotments have size, topographic, or other constraining factors which would preclude adoption of grazing systems which incorporate periods of rest. Under seasonal or continuous use, proposed stocking levels would continue to provide some limitation to shrub abundance and quality. However, better distribution of livestock through range improvement projects and increases in range condition would provide a gradual rate of enhancement because of improved forage conditions on so-called primary livestock range areas. Improved conditions on these areas could lower livestock use on more remote and rugged areas where competition with wildlife would be more likely.

Reservoir, spring, and pipeline development would create about 90 new watering facilities on the refuge by the year 2005. This would provide improved livestock distribution and eliminate some deteriorated conditions on present concentration areas. However, all water facilities would still receive a disproportionate amount of use under seasonal grazing systems and would not achieve desired wildlife cover levels. Under a grazing system where rest intervals are provided, desired cover levels would probably be met at least during deferred or rest phases of the cycle. Some fencing of reservoirs would occur in pastures used on a seasonal basis to improve habitat conditions.

Other developments such as boundary fences would eliminate excessive numbers of livestock which tend to move onto the refuge during hot, dry weather. Interior fences would be constructed to implement new grazing systems to benefit range conditions, wildlife habitat, and livestock management. No significant detrimental impacts to wildlife are expected to occur as a result of fence construction. Ripping of 38,000 acres would create a minimum 3,000 AUMs of additional forage for wildlife and livestock. Additional forage, stocking within authorized levels, and better water distribution would reduce grazing pressure on those areas which presently have inadequate residual vegetation. Desired levels of 8-10 inches of cover on 50 percent of potentially suitable areas would be achieved by the year 2005.

The season of use for livestock would be provided to meet the individual operator's needs as much as possible, while considering growth needs of major forage plant species and critical wildlife value.

Effects of livestock grazing under various grazing systems have been observed to be both beneficial and detrimental to wildlife (Appendix 16). Stevens (1966) and Mackie (1970) found that elk in Montana prefer areas which have had little use by cattle and that their movements are influenced by presence of cattle. Skovlin et al. (1968) found that elk use in the Blue Mountains of Oregon was significantly less on range cohabited with cattle than in areas where cattle use was restricted. Rates of elk use decreased as cattle stocking increased, but moderate cattle stocking inhibited elk as much as heavy cattle stocking. Skovlin and Harris (1970) found that elk preferred season-long cattle ranges to deferred rotation ranges when cattle stocking was light. However, elk preferred heavily stocked deferred rotation ranges to heavily stocked season-long ranges. Knowles (1975) found that elk tended to concentrate in areas not grazed by cattle on the Nichols Coulee allotment of CMR. Wittinger (1978) reported similar findings in the Salmon River drainage of Idaho. This distribution pattern suggests that land use competition occurs between elk and cattle. Knowles (1975) also suggested that limited mobility of mule deer made them vulnerable to any situation which resulted in intensive use of their home range by other ungulates. Intensive livestock grazing could therefore have detrimental impacts upon mule deer populations.

In looking at impacts of rest-rotation upon smaller forms of wildlife, Gjersing (1975) indicated that both breeding pairs of ducks and broods increased in response to periodic relief (rest-rotation) from grazing.

This alternative would be expected to significantly affect wild ungulates by increasing opportunities for competition for forage. Social intolerance would be an important factor which would lower habitat quality for mule deer and elk. Sharp-tailed grouse would be adversely affected by lower residual cover levels in some areas. Some benefits to mule deer and sage grouse could be expected in terms of improved sagebrush communities for winter forage. Livestock feeding patterns would tend to maintain or expand existing communities. Prairie dogs and their associated species are expected to benefit from the Multiple Use alternative which would maintain heavy livestock use areas in a disturbed condition. The net effect is expected to be a slight improvement over existing conditions (Appendix 14) for most wildlife species but considerably below the potential that exists if other alternatives are implemented. This alternative would not accomplish the wildlife objectives for CMR.

With the following exceptions, there would be the same recreational impacts as envisioned with the Proposed Action alternative. Development of a major backcountry (nonmotorized) trail as well as establishment of primitive campsites and sport fishing access sites at various locations throughout the refuge would increase dispersed recreation use and result in some conflicts with wildlife due to the greater number of people using remote sections.

Construction of a perimeter shoreline scenic road in the vicinity of Fort Peck would destroy a significant area of prime elk habitat and would probably cause a reduction in the herd. There also would be occasional disturbance of sharp-tailed grouse in spring when they use dancing grounds. Proper planning and implementation of a refuge transportation plan would minimize detrimental impacts to wildlife.

RECREATION AND CULTURAL RESOURCES

Of the five alternatives considered, this alternative would contribute the greatest amount toward meeting national and regional recreation requirement and needs identified in the Nationwide Outdoor Recreation Plan (Bureau of Outdoor Recreation 1973) and Montana Statewide Outdoor Recreation Plan (Montana Department of Fish and Game 1978). Recreation objectives approved for CMR would be satisfied.

Introduction of peregrine falcons would necessitate restriction of human disturbance during the breeding season (Snow 1972). Habitat improvements would be minor; therefore, wildlife hunting and viewing opportunities would not change significantly.

Forage allocations under the Multiple Use alternative would provide an initial reduction in livestock AUMs to allow range recovery in several allotments. This would provide visual enhancement of these areas as perennial mid-grass species begin to replace perennial short-grasses and annual forbs and grasses. Increases in livestock levels to 7,000-7,500 AUMs on UL Bend NWR would lower pristine qualities of this portion of the refuge for some people where no livestock are presently grazed. Increased livestock use would increase opportunities for conflict between recreation and livestock grazing on high use recreation areas.

Ripping of dense clay and panspots range sites would cause a visual intrusion for a minimum of 3-5 years. Other range developments such as interior fencing and construction of new reservoirs could lower environmental quality of the refuge for those individuals desiring a natural setting. Prescribed burning would result in a lowering of visual quality for 1-5 years.

In addition to those impacts discussed under the Proposed Action alternative, there would be increased use resulting from designation of a backcountry foot and horse trail running the length of the refuge; also from expansion of low density recreation areas. Expansion of interpretive facilities and attendant increases in wildlife-wildlands activities would present a more favorable image of the refuge to a greater number of people than with any of the other alternatives.

Due to the larger number of people who would recreate on the refuge under this alternative, there would be some conflicts between recreationists. With more vehicular traffic on existing and proposed roads including a shoreline drive, there would be greater maintenance requirements, increased erosion, and increased conflicts with wildlife. Due to increased use of refuge roads, there would be a corresponding increase in vehicular travel over roads leading into the refuge, across adjoining BLM and private lands, and some additional use of BLM lands for recreation. Some increased recreation is expected off the refuge as a result of implementation of this alternative.

Cultural resources would receive greater visitation and possible destructive impacts.

SOCIOECONOMICS

This alternative would reduce AUMs granted to refuge permittees by 26 percent during the 1978-1990 period, and by 12 percent in the 1991-2005 period. The direct loss to the ranchers under this alternative averages 2.3 percent in sales or gross income during the 1978-1990 period. The impact to two high dependency ranchers will be much greater. The direct and indirect effects are a loss of $664,830 in sales and 9 workers during the 1978-1990 period. These direct and indirect losses in sales will be reduced to $210,930 a year and 3 workers in the 1991-2005 period.

Increases in recreation visitation due to the Multiple Use alternative would have a direct plus indirect increase in sales of $651,643 and +14 workers in the 1978-1990 period. This increase in sales would increase to 1.8 million dollars in the 1991-2005 year period, while employment would increase 40 workers.

The net total effects (sum of the direct plus indirect effects for both livestock and recreation) is a small gain in sales of $13,817 and an increase of 5 workers in the 1978-1990 period. The combination of reduced livestock impacts and rising visitation causes regional sales to rise to $1.6 million dollars and 37 workers in the 1991-2005 period.

Table 15. Noneconomic effects, Multiple Use alternative, Charles M. Russell National Wildlife Refuge, Montana.

	Present situation	Multiple Use	
	(1978)	1990	2005
Habitat quality[1]			
Sharp-tailed grouse	4.6	4.8	5.3
Mule deer	5.6	5.9	6.5
Pronghorns	5.2	6.0	6.6
White-tailed deer	5.4	5.7	6.9
Elk	6.0	6.1	6.4
Waterfowl	3.4	4.5	7.5
Development			
Burn (acres)	0	400	1,500
Plant trees (acres)	0	0	0
Plant shrubs (acres)	0	100	300
Soil ripping (acres)	0	0	38,000
Ponds (acres)	0	225	900
Fences (miles)			
Exclosure[2]	0	2	10
Boundary (aprx.)	50	60	72
Interior	Unknown	32	40
Water projects (No.)			
Ponds (aprx.)	150	167	227
Troughs	13	23	26
Springs	0	2	2
Visitor days			
FWS	64,000	72,000	88,000
Other	293,000	333,000	370,000
Total	357,000	405,000	458,000
Forage (AUMs)			
Wildlife	50,000	58,000	60,000
Livestock (active)	56,524[3]	52,096	61,260
Total	106,524	110,096	121,260
Range condition (%)			
Poor	1	1	1
Fair	7	7	4
Good	74	74	80
Excellent	18	18	15

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[1] 0-2.5 = poor, 2.6-5.0 = fair, 5.1-7.5 = good and 7.6-10.0 = excellent.

[2] A precise estimate of acres enclosed/mile of fence is not provided due to presently undetermined topography and shape of exclosure. A general rule of thumb is 40 acres enclosed per mile of fence.

[3] This figure represents active AUMs; 3584 AUMs are inactive totaling 60,108 AUMs.

ALTERNATIVE E

(No Grazing)

SOILS-WATERSHED

Proposed fire management practices would result in opening of coniferous forest areas with increased grass and forb levels to retard runoff and soil loss. Elimination of grazing and implementing treatments such as planting and construction of temporary exclosures would provide more residual cover and shrub communities which would also retard runoff and decrease erosion. There would be no forage allocated to livestock under this alternative.

Soil erosion rates from man-caused actions would be minimal by the year 2005, following removal of all livestock from the refuge. Geologic erosion on steep or fragile sites would continue but at decreased levels because of increased plant and litter cover. It is not known if the decreased rates of erosion on these fragile sites would constitute a significant difference from present rates.

Soil erosion from overland runoff and wind is expected to decrease because of increased plant or litter cover. Bare ground exposed on more favorable range sites such as clayey, sandy, silty, or overflow could be expected to average 15 percent or less by 1990, and 5 percent or less by the year 2005. These levels have been achieved on similar range sites presently excluded from livestock use, whereas estimates of samples of grazed range sites in 1978 indicated an average of from 20-42 percent bare ground on the respective range sites for all samples taken.

Soil erosion rates would be minimal as they relate to accelerated erosion. Soil ripping practices plus increased plant and litter cover levels following removal of all livestock from CMR would provide attainment of the highest potential soils and watershed conditions on a refuge-wide basis. However, increased litter cover would provide for greater risk of uncontrollable wildfire. Litter accumulation may provide the necessary fuel for burns which may be hot enough to kill perennial grass species. Uncontrolled wildfires could conceivable result in massive soil losses through erosion, especially if vegetation is killed.

About 10,000 acres of accessible dense clay and panspots range sites would be treated by the 2005. Such treatment would provide greater water infiltration, less runoff, a significant increase (two- to five-fold) in vegetative production, and improved soil properties. The increased vegetative cover, in addition to reducing erosion, would provide additional forage and security for wildlife.

Interior fences would be allowed to deteriorate or would be removed and reservoirs on marginal sites allowed to fill with silt. Gradual reduction in grazing through the year 2005 would provide an accelerated rate of return to natural conditions with man-caused erosion effectively eliminated by the year 2005. Geologic erosion would continue actively on the more fragile and susceptible sites such as breaks and shale areas.

The refuge boundary fence would serve to prevent all livestock use on refuge lands and maintain soil and watershed quality. No significant detrimental impacts to wildlife are expected to result from boundary fence construction. Impacts of recreation and cultural resources would be the same as for the Proposed Action alternative.

WILDLIFE HABITAT-RANGE RESOURCES

Lack of residual vegetation for cover and food is limiting to several species of wildlife. Complete elimination of livestock grazing would provide adequate amounts (8-10 inches) of residual vegetation on almost all suitable sites. This would mean adequate nesting and hiding cover for sharp-tailed grouse, other ground nesting birds, and some small mammals and forage for elk, mule deer, and pronghorns. However species such as the prairie dog would show a decline from the No Grazing action.

Reintroduction of black-footed ferrets and peregrine falcons would add diversity to wildlife on the refuge and help in reestablishing these endangered species.

Elimination of grazing and associated disturbances would mean a reduction in the number and size of prairie dog towns. As a result, it would reduce habitat for such unique species as burrowing owls and mountain plovers as well as the potential success of swift fox and black-footed ferret reintroductions. It would provide more favorable conditions for bighorn sheep (Eichhorn and Watts 1976). There would be a maximum percentage of suitable sites for sharp-tailed grouse. Habitat to support white-tailed deer would be excellent. Waterfowl numbers would increase somewhat while habitat to support pronghorns would decrease. Small mammals and birds show varied results to different grazing levels or lack of grazing depending upon their respective habitat requirements. Ground squirrels are discouraged from using heavy stands of tall grasses (Smith 1940). Pocket gophers prefer deteriorated range because of greater numbers of tap-rooted and bulbous-rooted plants (Buechner 1942). Meadow mice favor climax or near climax conditions (Vories and Taylor 1940).

Smith (1940) found that nongame birds quickly disappeared from overgrazed lands in the mixed grass prairie. Weatherill and Keith (1969) found that moderate grazing may improve habitat for such species as mountain plovers and western meadowlarks. Owens and Myres (1973) found that disturbance of a fescue grassland by mowing or cattle grazing reduced or eliminated Bairds' sparrow and Sprague's pipit, but did not affect savannah or clay-colored sparrows and western meadowlarks and permitted ingress of prairie horned larks and chestnut-collared longspurs.

Range deterioration may reduce populations of some native birds and allow an increase of insects that damage residual grass (Daubenmire and Daubenmire 1968). Page et al. (1978) found that Nevada and California habitats had generally lower densities and numbers of species of nongame wildlife on grazed versus ungrazed areas.

Residual cover for sharp-tailed grouse nesting would eventually be at a level of 8-10 inches on 95-100 percent of all suitable sites by elimination of livestock grazing. Some areas would have 10-12 inches of residual cover. This would greatly accelerate overall habitat improvement from fair to excellent for this species.

Effective management of sagebrush flats for pronghorns and associated species would be limited with no livestock grazing. Removal of livestock would eliminate a key tool in manipulation of sagebrush communities because of livestock preference for grasses and forbs over browse. The shrub canopy in these stands would be expected to decrease with time to canopy cover ranges of 5-20 percent. Grass and forb enhancement would occur. Value as critical winter range could decline for pronghorns as a result of reduction in sagebrush stands, while increased forb and grass production would make these communities more valuable for some wildlife during remaining seasons.

Because livestock grazing would be eliminated on the refuge, adjacent landowners might stock their own lands above carrying capacity levels. This heavy stocking could cause the most severe degradation of wildlife habitat on adjacent lands for any of the five alternatives.

No livestock grazing would provide optimal rates of return to climax conditions by the year 2005. Minor drainages that have the potential of supporting riparian communities would do so under this alternative. Construction of temporary fences to exclude wildlife until shrubs were reestablished, and planting of shrubs would improve riparian conditions on treated sites. The final result would be an increase in habitat condition from good to excellent on sites capable of supporting a riparian community.

Key shrubs are lacking for use as food, cover and perches. No livestock grazing, when combined with prescribed burning-browse reseeding (11,300 acres) and seedling planting (500 acres), would provide excellent opportunities to reach desired shrub community levels. Desired shrub levels would be met or exceeded on 60 percent of potentially suitable sites by the year 2005 and on all suitable areas in 40-50 years.

Prescribed burning would increase deciduous browse which is vital as a source of mule deer winter food. K. Hamlin (personal communication) indicated forbs are important to mule deer in all snow-free seasons. Eichhorn and Watts (1974) found that shrub and forb production on wildfire burns in the Missouri River breaks was substantially higher than on unburned control areas. Burning to increase shrubs and forbs would help increase ability of the habitat to support over-wintering populations of over 12 deer/sq. mile.

Effects of increased burning in nonsagebrush communities and reduced levels of sagebrush on sagebrush flats would be somewhat offsetting to mule deer habitat. Deer would tend to make higher use of deciduous shrubs enhanced by burning for winter forage to replace sage, which is presently heavily used in the winter.

Tree planting would occur on 4,700 acres with impacts similar to the Intensive Wildlife Management alternative.

All riparian areas would improve to their maximum potential along intermittent and continuous streams and would improve the fishery resource more than any other alternative.

Impacts for all animal damage control would be the same as the No Action alternative.

Federal livestock AUMs would be reduced by about 10 percent/year until the total elimination of livestock occurred. All state and private AUMs would be eliminated by the year 2005. All forage would be available for wildlife to fulfill habitat needs for food and cover by the year 2005. Habitat quality resulting would be such that it could support a sharp-tailed grouse spring breeding bird density of 35-40 birds/sq. mile. In addition, grass, and especially forb levels, would increase for use by pronghorns, sage grouse, and mule deer.

Impacts to wildlife habitat of implementing this alternative would be somewhat similar to the Proposed Action alternative, except that all AUMs would be provided to wildlife for food and cover. No prescription grazing by livestock would be allowed, and this would limit the scope of habitat management treatments to benefit wildlife species associated with seral stages of vegetation. The scope of improvements proposed would be less than for Intensive Wildlife Management. There is less likelihood that all wildlife objectives would be met or exceeded with this alternative.

With no forage allocated to livestock, it is possible that overall site productivity and vigor would decline slightly over time on a refuge-wide basis, since litter accumulations would lower the rate of seedling establishment and stifle new shoot growth on mature plants. However, a study of livestock exclosures in the Nichols Coulee area of the refuge does not lend support to one theory (Cosby 1978) that nonuse results in range stagnation. Clipping studies of livestock exclosures on the refuge protected from livestock grazing for approximately 12 years reveal no such range stagnation from nonuse. These excluded areas instead have higher productivity than similar sites which are grazed by livestock under a rest-rotation grazing system (Oldemeyer et al. 1980).

Ripping as much as 10,000 acres of dense clay and panspots range sites would improve vegetative productivity and residual cover levels for wildlife.

Impacts of recreation on wildlife habitat-range resources would be the same as described under the Proposed Action.

RECREATION AND CULTURAL RESOURCES

As with the Proposed Action, this alternative would contribute an intermediate amount toward meeting national and regional recreation requirements and needs identified in the Nationwide Outdoor Recreation Plan (Bureau of Outdoor Recreation 1973) and the Montana Statewide Outdoor Recreation Plan (Montana Department of Fish and Game 1978). Recreation objectives identified for CMR would be met.

Introduction of peregrine falcons would necessitate curtailment of human disturbance during the breeding season (Snow 1972) in three small areas. However, these areas are in the backcountry and presently receive only limited public use. Habitat management would provide some increased viewing and hunting opportunities. Effects of forage allocations would be similar to those provided under the Intensive Wildlife Management alternative, except that complete removal of livestock would substantially enhance aesthetic qualities of the refuge for some recreationists. The complete removal of livestock from refuge lands would cause adverse reaction from adjacent land-owners; they would close more of their land to public use.

Removal or deterioration of all existing internal range improvements would enhance visual quality for wildlife-wildlands recreation. Impacts from ripping would primarily be associated with furrowing on upper soil horizons. These effects would last a minimum of 3-5 years. Prescribed burning would result in a lowering of visual quality for 1-5 years.

Impacts of this alternative would be about the same as those discussed for the Proposed Action. However, the primary difference between the two alternatives would be improvement in the quality of the recreation experience under the No Grazing alternative due to elimination of conflicts between livestock and humans where they exist. Also, cultural resources would be subject to less disturbance, resulting in greater protection of sites and structures.

SOCIOECONOMICS

Federal AUMs would decrease from 60,108 in 1978 to 30,000 in 1990. AUMs would be reduced to zero between 1990-2005. Direct effects of these reductions on refuge ranchers is a loss in gross income of sales of $567,000 or 5.3 percent loss in sales on the average during the 1978-1990 period. These adverse impacts would increase the loss in sales to 1.2 million dollars, averaging 10.5 percent during the 1991-2005 period.

Obviously, the eleven highly dependent ranchers would be adversely affected to a substantial degree. Of the eleven economically viable high dependence ranchers, the largest individual impact would be a 74 percent reduction in sales if the No Grazing alternative was adopted. The next largest individual impact would be a 60 percent reduction in sales.

The direct and indirect effects of the livestock portion of the No Grazing alternative would be a reduction in regional sales of 1.5 million dollars and a loss in employment of 21 workers during the 1978-1990 period. These losses would increase to 2.9 million dollars and a loss of 43 workers in the 1991-2005 period.

Direct and indirect effects on recreation and tourism in sales is positive. Direct plus indirect sales would increase by $271,518, and employment would increase by 6 workers in the 1976-1990 period. During the 1991-2005 period, direct plus indirect effects would increase sales $597,340 and employment of 13 workers.

The net total effect (sum of livestock and recreation direct plus indirect effects) is a loss of 1.2 million dollars in sales and 15 workers in the 1978-1990 period. This adverse effect increases to 2.398 million dollars and a loss of 30 workers in the 1991-2005 period. The change in regional employment is less than 1 percent.

Table 16. Noneconomic effects, No Grazing alternative, Charles M. Russell National Wildlife Refuge, Montana.

	Present situation (1978)	No Grazing 1990	No Grazing 2005
Habitat quality[1]			
Sharp-tailed grouse	4.6	6.8	8.6
Mule deer	5.6	7.0	7.5
Pronghorns	5.2	5.9	6.3
White-tailed deer	5.4	6.8	7.9
Elk	6.0	7.0	7.8
Waterfowl	3.4	6.0	8.3
Development			
Burn (acres)	0	2,800	11,300
Plant trees (acres)	0	1,175	4,700
Plant shrubs (acres)	0	125	500
Soil ripping (acres)	0	0	10,000
Ponds (acres)	0	0	0
Fences (miles)			
Exclosure[2]	0	2	6
Boundary (aprx.)	50	50	450
Interior	Unknown	0	0
Water projects (No.)			
Ponds (aprx.)	150	150	150
Troughs	13	13	13
Springs	0	0	0
Visitor days			
FWS	64,000	71,000	74,000
Other	293,000	327,000	361,000
Total	357,000	398,000	435,000
Forage (AUMs)			
Wildlife	50,000	80,000	130,000
Livestock (active)	56,524[3]	30,000	0
Total	106,524	110,000	130,000
Range condition (%)			
Poor	1	1	1
Fair	7	7	4
Good	74	67	15
Excellent	18	25	80

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[1] 0-2.5 = poor, 2.6-5.0 = fair, 5.1-7.5 = good and 7.6-10.0 = excellent.

[2] A precise estimate of acres enclosed/mile of fence is not provided due to presently undetermined topography and shape of exclosure. A general rule of thumb is 40 acres enclosed per mile of fence.

[3] This figure represents active AUMs; 3584 AUMs are inactive totaling 60,108 AUMs.

V. LIST OF PREPARERS AND REFERENCES

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Note: The Billings Area Office closed 1982, and all refuge management functions were transferred to the Denver, Colorado Regional Office.

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VI. CONSULTATION AND COORDINATION

VI. CONSULTATION AND COORDINATION

Public participation during this EIS process began in 1977, when a group with diverse interests and backgrounds in natural resources toured the refuge and provided management recommendations. A steering committee was established with members comprised of representatives from BLM, MDFWP, COE, MDSL, FWS, and Montana State Department of Natural Resources. This steering committee has been involved throughout the planning and EIS process.

Public meetings were held in several Montana cities in April 1978 to determine significant issues on the refuge and to get public involvement in formulating long range goals for the refuge. Additional meetings were held by COE in June 1979, and joint meetings involving both COE and FWS were held in September 1979 to obtain public participation immediately prior to EIS preparation.

Public meetings following distribution of the first DEIS were held in Washington, D.C., and Lewistown, Glasgow, and Missoula, Montana, during late 1980. Public meetings following release of the second DEIS were held in Glasgow, Lewistown, and Missoula in the Fall of 1984.

Both DEIS's have been provided to interested agencies and organizations, many of whom have already contributed substantially to its preparation (Table 17). Additionally, nearly 1,000 copies have been sent to legislators, interested individuals, media, and local libraries with each DEIS release.

Table 17. Agencies and organizations which provided comments on both draft EIS's, Management of Charles M. Russell National Wildlife Refuge, Montana.

AGENCIES

Members of Congress

U.S. Senator	Max Baucus
U.S. Senator	John Melcher
U.S. Representative	Ron Marlenee
Montana State Senator	Mark Etchart

Federal Agencies

Advisory Council on Historic Preservation
Charles M. Russell NWR Advisory Committee
Department of Agriculture, Soil Conservation Service
Department of the Air Force

Department of the Army, Corps of Engineers
Department of Commerce, National Oceanic and Atmospheric Administration
Department of Housing and Urban Development
Department of Interior
    Bureau of Land Management
    Bureau of Mines
    Geologic Survey
    Heritage Conservation and Recreation Service
    National Park Service
Department of Transportation
    U.S. Coast Guard
Environmental Protection Agency

State Agencies or Affiliates

Montana Cooperative Extension Service
Montana Department of Fish, Wildlife and Parks
Montana Department of Livestock
Montana Department of Natural Resources and Conservation
Montana Department of State Lands
Montana Historic Society
Montana Public Lands Council
Montana State Rural Development Committee
Montana State University
Office of the Governor, Montana

Organizations and Local Agencies

American Wilderness Alliance
Animal League of Long Island, NY
Animal Protection Institute of America
Archery Division, Billings Rod and Gun Club
Billings Rod and Gun Club
California Animal Defense and Anti-vivisection League
Centre County Federation of Sportsmen's Clubs, PA
Defenders of Wildlife
Ecology Center of Southern California
Elsa Wild Animal Appeal
Federation of Western Outdoor Clubs
Fish and Wildlife Forum, Montana State University
Flathead Audubon Society
Flathead Wildlife, Inc.
Fort Peck Cabin Association
Gallatin Wildlife Association
Garfield County Commercial Club
Garfield County Commissioners
Garfield-McCone Legislative Association
Glasgow Chamber of Commerce and Agriculture
Glasgow Irrigation District

Humane Society of the United States
Indian Butte State Cooperative Grazing District
Last Chance Audubon Society
Lewistown Bowhunters Association
Lewistown Rod and Gun Club
McCone County Commissioners
Miles City Area Chamber of Commerce
Montana Association of Conservation Districts
Montana Association of Fish and Wildlife Biologists
Montana Association of State Grazing Districts
Montana Audubon Council
Montana Bowhunters Association
Montana Chamber of Commerce
Montana Chapter, Wildlife Society
Montana Natural Resource Clinic
Montana Stockgrowers Association, Inc.
Montana Trappers Association
Montana Wilderness Association
Montana Wildlife Federation
National Audubon Society
National Cattlemen's Association
National Wildlife Federation
National Wildlife Refuge Association
National Woolgrowers Association
Natural Area Council
Natural Resources Defense Council, Inc.
People for Animal Rights
Petroleum County Commissioners
Phillips County Commissioners
Pintlar Audubon Society
Progressive Animal Welfare Society
Rocky Mountain Region, National Audubon Society
Sierra Club
Southeastern Montana Sportsmen Association
Square Butte Grazing Association
Upper Missouri Group, The Sierra Club
Valley County Commissioners
Valley County Conservation District
Valley County Development Council
Western Montana Fish and Game Association
Wilderness Society
Wildlands and Resources Association
Wittmayer Grazing Association
Wolf Point Chamber of Commerce and Agriculture
Yellowstone Valley Audubon Society

SUMMARY OF COMMENTS RECEIVED FOLLOWING REVIEW OF BOTH DEIS'S

A total of 396 letters was received during or after the comment period for the first DEIS which ended on December 5, 1980, although letters received after that deadline were also accepted. Of the total letters received, 4 were from legislators, 25 from Federal and State agencies, 33 from various organizations and 334 from individuals. Included in the letters received from individuals were 196 letters which were almost identical to that of Ms. Cindy Davis, 53 almost identical to that of Mr. and Mrs. Adams, and 57 similar to that of Mr. Walter Collins. Of these three groups, the letters of Ms. Davis, Mr. and Mrs. Adams, and Mr. Collins were considered representative and are the only ones printed.

Public hearings were held on October 28, 29, and 30, and November 3, 1980, to receive comments on the DEIS. These hearings were held in Missoula, Lewistown, and Glasgow, Montana, and Washington, D.C. A total of approximately 300 persons attended these hearings and 49 statements were presented. Transcripts of these hearings are on file at U.S. Fish and Wildlife Service, Wildlife Resources, P.O. Box 25486, Denver Federal Center, Denver, CO 80225.

A total of 420 letters were received during or after the comment period for the second DEIS which ended on August 15, 1984. Letters received after that deadline were also accepted. Of the total letters received, one was from a legislator, 10 from Federal and State agencies, 51 from organizations, and 358 from individuals. Identical, preprinted cards were received from 1290 individuals. Included in the letters received from individuals were 45 which were very similar to that of Cecil E. Gubser, 45 very similar to that of Gayle Sanfilippo, 5 very similar to that of Mr. and Mrs. James L. Hines, 4 identical to that of Roy L. Wetzel, 5 identical to that of Neil I. Paxon, and 1290 identical to the preprinted card of Joanne Obergfell. Of these six groups, the letters of Cecil E. Gubser, Gayle Sanfilippo, Mr. and Mrs. James L. Hines, Roy L. Wetzel, and Neil I. Paxson, and the card from Joanne Obergfell were considered representative and are the only ones printed.

Public hearings on the second DEIS were held on July 31, August 1, and August 2, 1984, in Glasgow, Lewistown and Missoula, respectively. A total of 76 statements were presented.

Responses were required to many of the letters. These letters, along with the responses, are printed at the end of this document. Also printed are letters that did not require a response. Letters are arranged in the following order: government agencies, legislators, state agencies, organizations, and individuals. Statements in each letter requiring a response are numbered in consecutive order on the right-hand side. The responses which immediately follow the letter correspond to these numbers.

Transcripts of the public hearings on the second DEIS, with responses, follow the letters.

SUMMARY OF CHANGES FROM THE SECOND DEIS

Editorial and factual changes have been made throughout the text as a result of the review process following the second DEIS. Tables have been corrected where necessary.

Changes in the FEIS include:

> Suggestions for improvement from comments.
>
> Further clarification of procedures and other parts of the DEIS where comments suggest poor communication.
>
> Greater emphasis on monitoring of management actions to evaluate effectiveness in meeting refuge objectives.
>
> Increased emphasis on differentiation between wildlife habitat condition and range condition.

VII. APPENDICES

VII. APPENDICES

Appendix 1. Section 7 evaluation, Charles M. Russell National Wildlife Refuge, Montana.

Alternatives in this EIS may affect one to three endangered species: black-footed ferrets, peregrine falcons, and bald eagles. Section 7 of the Endangered Species Act states that all federal agencies shall consult with the Secretary of the Interior on the following items: 1) review and utilize existing programs to further the purposes of the act; 2) carry out programs for the conservation of endangered or threatened species; and 3) ensure that their actions do not jeopardize such species or result in modification or destruction of their critical habitat.

This consultation involves filling out standard Section 7 forms. These forms are then forwarded through administrative channels. Actions that are determined not to affect endangered species can be retained by the regional office or forwarded to Washington. Actions that may affect endangered species are sent to Washington for review. Actions determined to have a significant adverse or beneficial effect on endangered species are referred to the Director of FWS for his decision to ensure that they and their habitats receive full consideration. The following forms are the first step in this Section 7 process.

No Action Alternative

1. Region: 6

2. Designation: 6-1-80-C
(region-area-FY)

3. Program(s): Refuges and Wildlife (R&W), CMR

4. Listed species or their critical habitats considered: Species are the same within the action area and adjacent to the action area.

   Black-footed ferret, American peregrine falcon, and bald eagle.

5. Name and description: Charles M. Russell National Wildlife Refuge Environmental Impact Statement.

6. Location: Charles M. Russell National Wildlife Refuge, Montana.

7. Objectives of the action:
   a. Maintain habitat for black-footed ferrets.

b. Monitor peregrine falcon use of wintering areas near Fort Peck.
c. Maintain existing migration habitat for bald eagles.

8. Explanation of impacts of action on listed species or their critical habitats (attach supporting biological data):
a. None. No ferrets are known to occur and their habitat is secure.
b. None. Current use is by migrants that utilize migrating ducks and small passerines as a food source.
c. None.

9. Conclusion:	May Affect	Will Not Affect
Black-footed ferret		X
American peregrine falcon		X
Bald eagle		X

10. Recommendation (including action modification):
Continue monitoring existing use by peregrine falcons and bald eagles.

Proposed Action alternative

1. Region: 6

2. Designation: 6-1-80-C
(region-area-FY)

3. Program(s): R&W, CMR

4. Listed species or their critical habitats considered:
Species are the same within the action area and adjacent to the action area.
Black-footed ferret, American peregrine falcon, and bald eagle.

5. Name and description: Charles M. Russell National Wildlife Refuge Environmental Impact Statement.

6. Location: Charles M. Russell National Wildlife Refuge, Montana.

7. Objectives of the action:
a. Maintain habitat for and reintroduce a minimum of six pairs of black-footed ferrets on six or more prairie dog towns as soon as ferrets are available.
b. Reintroduce peregrine falcons and maintain two peregrine falcon eyries by 1990 and a third by the year 2005.
c. Maintain existing migration habitat for bald eagles and determine feasibility of establishing a breeding population on CMR.

8. Explanation of impacts of action on listed species or their critical habitats (attach supporting biological data).
a. Black-footed ferrets could be managed, protected, and propagated on CMR. Their habitat, prairie dog towns, would remain static or increase slightly to fulfill the ferrets' habitat requirements.
b. Peregrine falcons would be managed, protected, and propagated. CMR would provide an excellent are to reintroduce them. Habitat for nesting would not change, but peregrines' food sources would be increased as a result of more residual ground cover which would allow more ground nesting passerines.
c. If areas are identified, management actions could be taken to enhance bald eagle nesting.

9. Conclusion:

Conclusion:	May Affect	Will Not Affect
Black-footed ferret	X	
American peregrine falcon	X	
Bald eagle	X	

10. Recommendation (including action modification):
Accomplish objectives by the year 2005.

Intensive Wildlife Management alternative

1. Region: 6

2. Designation: 6-1-80-C
(region-area-FY)

3. Program(s): R&W, CMR

4. Listed species or their critical habitats considered:
Species are the same within the action area and adjacent to the action area.
Black-footed ferret, American peregrine falcon, and bald eagle.

5. Name and description: Charles M. Russell National Wildlife Refuge Environmental Impact Statement.

6. Location: Charles M. Russell National Wildlife Refuge, Montana.

7. Objectives of the action:
a. Maintain habitat for and reintroduce a minimum of six pairs of black-footed ferrets on six or more prairie dog towns as soon as ferrets are available.
b. Reintroduce peregrine falcons and maintain two peregrine falcon eyries by 1990 and a third by the year 2005.
c. Maintain existing migration habitat for bald eagles and determine feasibility of establishing a breeding population on CMR.

8. Explanation of impacts of action on listed species or their critical habitats (attach supporting biological data):

   a. The black-footed ferret, as an endangered species, could be managed, protected, and propagated on CMR. Their habitat, prairie dog towns, would remain static or decrease slightly.

   b. The peregrine falcon would be managed, protected, and propagated. CMR would provide an excellent area to reintroduce the species. Habitat for nesting would not change but the peregrines' food source would be increased as a result of more residual ground cover which would allow more ground nesting passerines to be available as a food source.

   c. Cottonwood trees could be planted to provide nesting sites along the shoreline on Fort Peck Reservoir in protected bays and given special attention (protection, water, shade, fence) until they are 5-10 years old. The annual fluctuation in reservoir levels may prevent trees from becoming established. Cattle use may destroy the trees before they become established. Artificial nesting structures could be used until the trees are tall enough.

9 Conclusion:	May Affect	Will Not Affect
Black-footed ferret	X	
American peregrine falcon	X	
Bald eagle	X	

10. Recommendation (including action modification):
Accomplish objectives by the year 2005.

Multiple Use alternative

1. Region: 6

2. Designation: 6-1-80-C
(region-area-FY)

3. Program(s): R&W, CMR

4. Listed species or their critical habitats considered:
Species are the same within the action area and adjacent to the action area.
Black-footed ferret, American peregrine falcon, and bald eagle.

5. Name and description: Charles M. Russell National Wildlife Refuge Environmental Impact Statement.

6. Location: Charles M. Russell National Wildlife Refuge, Montana.

7. Objectives of the action:
   a. Maintain habitat for and reintroduce one pair of black-footed ferrets on one of the larger prairie dog towns at UL Bend as soon as ferrets are available.
   b. Reintroduce peregrine falcons and maintain two peregrine falcon eyries by 1990 and a third by the year 2005.
   c. Maintain existing migration habitat for bald eagles.

8. Explanation of impacts of action on listed species or their critical habitats (attach supporting biological data):
   a. Only one pair of ferrets could be maintained under this option because prairie dog control would be carried out as needed.
   b. Peregrine falcons would be managed, protected, and propagated. CMR would provide an excellent area to reintroduce the species. Habitat for nesting would not change but the peregrines' food source would be decreased as a result of less residual ground cover which would allow fewer ground nesting passerines to be available as a food source.
   c. None.

9.

Conclusion:	May Affect	Will Not Affect
Black-footed ferret	X	
American peregrine falcon	X	
Bald eagle		X

10. Recommendation (including action modification): Accomplish objectives by the year 2005. Modify grazing in areas of proposed introduction of ferrets and falcons so as not to adversely affect each specie's food base.

No Grazing alternative

1. Region: 6

2. Designation: 6-1-80-C
   (region-area-FY)

3. Program(s): R&W, CMR

4. Listed species or their critical habitats considered:
   Species are the same within the action area and adjacent to the action area.
   Black-footed ferret, American peregrine falcon, and bald eagle.

5. Name and description: Charles M. Russell National Wildlife Refuge Environmental Impact Statement.

6. Location: Charles M. Russell National Wildlife Refuge, Montana.

7. Objectives of the action:
   - a. Maintain habitat for and reintroduce a minimum of six pairs of black-footed ferrets on six or more prairie dog towns as soon as ferrets are available.
   - b. Reintroduce peregrine falcons and maintain two peregrine falcon eyries by 1990 and a third by the year 2005.
   - c. Maintain existing migration habitat for bald eagles and determine the feasibility of establishing a breeding population on CMR.

8. Explanation of impacts of action on listed species or their critical habitats (attach supporting biological data):
   - a. The black-footed ferret, as an endangered species, would be managed, protected, and propagated on CMR. Their habitat, prairie dog towns, would decrease slightly because no grazing would occur to help retard vegetative growth around dog towns.
   - b. The peregrine falcon would be managed, protected, and propagated. CMR would provide an excellent area to reintroduce the species. Habitat for nesting would not change but the peregrines' food source would be increased as more residual ground cover is provided to enhance habitat values for such prey as passerine birds.
   - c. If areas are identified, management actions could be taken to enhance bald eagle nesting.

9. Conclusion:

Conclusion:	May Affect	Will Not Affect
Black-footed ferret	X	
American peregrine falcon	X	
Bald eagle	X	

10. Recommendation (including action modification):
Accomplish objectives by the year 2005.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
WASHINGTON, D.C. 20240

ADDRESS ONLY THE DIRECTOR
FISH AND WILDLIFE SERVICE

803.7

In Reply Refer To:
FWS/OES 6-80-162

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YACC

Memorandum

To: Regional Director, Region 6 (ARD/FA)

From: Director

Subject: Intra-Service Section 7 Consultation, Management of Charles M. Russel (CMR) National Wildlife Refuge Montana (RW 803.7)

This responds to your September 2, 1980, request for Section 7 consultation on the five management alternatives proposed to solve some of the resource problems on CMR, relative to the listed black-footed ferret (Mustela nigripes), the bald eagle (Haliaeetus leucocephalus), and the American peregrine falcon (Falco peregrinus anatum).

On October 29, 1980, we completed an examination of the above action and reviewed the biological information provided by you along with information available in our files. During the course of this consultation, Mike Pramsteller, National Wildlife Federation Raptor Information Center, Arlington, Virginia; Dan James and Jay Sheppard, Office of Endangered Species; Gerald Craig, Rocky Mt. Peregrine Falcon Recovery Team, Leader; Jim Grier, Northern States Bald Eagle Recovery Team, Leader; and Bart O'Gara and Chris Servheen, Wildlife Coop Unit, Missoula, Montana, were contacted.

A review of the project information and information obtained from the experts and other knowledgeable sources on the biology of the listed species indicates that the actions of the proposed management alternatives may result in developing habitat for black-footed ferrets that is at least equal to that which now exists by manipulating grazing patterns to keep prairie dog towns at their present level, except for the no grazing alternative under which there might be some reduction in the level of prairie dog towns. The general tendency of all alternatives (except the no action alternative) to improve habitat for wildlife should provide improved conditions for the bald eagle and especially the peregrine falcon by improving riparian habitats, and thereby increasing the number and variety of avian prey for the latter species.

[illegible] 12 '80
[illegible]

The reintroduction of black-footed ferrets and the establishment of peregrine falcon eyries, as these animals become available, (under all except the no action alternative) would contribute to the possibility of eventually recovering these species. The no action alternative will at least leave habitat for these two species in its present condition.

Therefore, it is my biological opinion that your action, as proposed, is not likely to jeopardize the continued existence of the black-footed ferret, bald eagle, or peregrine falcon.

To assist you in exercising your authority for the conservation of listed species, the following actions are recommended:

1. Dr. Louis Locke of the National Wildlife Health Laboratory in Madison, Wisconsin, is currently conducting a detailed study of secondary lead poisoning in raptors, prompted by preliminary evidence that raptors may be affected by ingesting lead contaminated waterfowl. Any refuge having an incidence or suspicion of secondary lead poisoning in raptors should immediately contact Dr. Locke at FTS 364-5422 or Commercial 608/264-5422.

2. During waterfowl hunting seasons various means such as signs or posters at hunting access points, in blinds, etc., should be used to warn hunters of the possible occurrence of bald eagles and peregrine falcons in the area and to help them identify these two species.

3. Once attempts are underway to establish peregrine falcon eyries, care should be taken to limit human activities within the vicinity of these sites.

Should this action, as now planned, be modified or altered, or should new species be listed that may be affected, you must reinitiate consultation.

Harold J. O'Connor

Appendix 1b. The Planning Process

The conclusions reached in regard to wildlife and grazing in the Proposed Action require the understanding of the step-by-step process and rationale used, progressing from the mission statement to monitoring of specific actions taken to reach the objectives. This process is summarized here for clarification:

The mission statement (page 4) for CMR is based on that of the National Wildlife Refuge System. The CMR goals, in priority order (page 4), are derived from and expand upon the CMR mission statement. They are more specific in stating the purposes and activities desirable and permitted on CMR. From these goals were derived the even more specific objectives, also in priority order (pages 5, 6, and 7), often quantified, and providing desired end points. These end points were sometimes modified following determination of habitat potential and resolution of conflict that came later in the planning process. The wildlife objectives drive the planning process, dominate the other objectives, and may modify or preclude the others if conflicts arise that cannot be resolved in any other way. In the case of the Proposed Action, additional policy constraints (page 11) were imposed by Management.

With the above guidelines and constraints, a list of important and indicator wildlife species, both game and nongame, were selected (Appendix 2). The present value of the refuge for these species, and the deficiencies of the habitat for each of these, was determined for the refuge through sampling, using the 1976 Habitat Evaluation Procedure (HEP). Habitat potentials for the selected species were estimated, based upon interpretation of soils information (Appendix 7), range site and condition survey data (Appendices 8 and 9), HEP criteria (Appendix 2), literature review, and information on wildlife population densities and distribution.

From this point, it was possible to envision a desired, general habitat model for the refuge as a whole that would permit achieving the best mix of wildlife objectives. This required some tradeoffs among the selected wildlife species (what is best for one species is not necessarily best for another). These tradeoffs were weighted in favor of those species judged to be the more important ones on CMR and specified in the Executive Order. It quickly became clear that maximum diversity and interspersion of habitat would best accomplish a desirable mix of wildlife when viewed for the refuge as a whole. The habitat model included such concepts as variety of habitat types, edge, interspersion of habitat types, maximum amounts of deciduous shrubs, and varying degrees of utilization of forage.

The next step was to analyze possible ways to achieve the conditions envisioned in the desired habitat model and select those that would do the job. Wildlife foraging, livestock grazing, fire, planting, and mechanical manipulation were considered. In the case of the Proposed Action, freedom to choose methods of achieving the habitat model on the ground was constrained by policies (page 11). It is concluded for the Proposed Action that light, seasonal livestock grazing at various times of the year and in various places, along with limited use of fire, fencing, and planting would accomplish the objectives within policy constraints.

During the same time as the above was being done, a range site and condition survey (Appendices 8 and 9) was made in accordance with Soil Conservation Service procedures which resulted in a standard computation of existing AUMs of forage. The AUMs derived from this method were then subjected to a slope/water matrix (Appendix 15) to more realistically determine availability of forage to livestock.

When the results of this process, along with small, additional soil factor reductions, were analyzed, it became clear that in most cases the resultant AUMs represented light stocking rates, so further adjustments for stocking would generally not be needed to conform to the habitat model. However, a few additional reductions were made to meet specific wildlife needs in key areas.

The next step, upon receiving the Record of Decision, will be to develop Habitat Management Plans, largely based upon grazing allotment boundaries, to achieve wildlife and other objectives. These plans will be in conformity with the guidance provided in the EIS, but, unlike the EIS, will be site specific and designed to meet the particular wildlife needs within the areas of concern. They will be developed in cooperation with involved landowners, BLM, and other affected parties.

The final step will be to monitor the progress of the Habitat Management Plans towards achieving refuge objectives and make adjustments as they are needed.

Appendix 2. Habitat evaluation procedures and values on Charles M. Russell National Wildlife Refuge, Montana.

INTRODUCTION

The habitat evaluation procedures (HEP) used in this document originated with FWS to gather information for planning and decision making. Data on habitat needs of various indicator species were collected from scientific publications, documented research findings, field notes, and professional judgments. Through this process of documentation, the best information available on species habitat needs was compiled. This data base is subject to change as new information becomes available, but existing knowledge provides a sound scientific basis from which to proceed.

The system of analysis evaluates criteria on a scale of 1 to 10, with 10 being an ideal condition. Because habitat evaluation criteria are derived from locations with varying climates and soils, the criteria value of 10 may not be possible to obtain on CMR. Average annual precipitation on CMR is only 10-13 inches, and soils are largely Bearpaw shales, which have low production potential. It is important to keep these limitations in mind when considering the evaluation criteria.

METHODOLOGY

The refuge was flown in June and July 1977 to obtain color infrared (CIR) photos at a scale of 1:24000. These photos were interpreted to determine vegetative types (Appendix Table 2-A). The literature was not definitive for all vegetative breakdowns, and certain types were combined into the following categories for evaluation: sagebrush-greasewood-grasslands, ponderosa pine-juniper, and grassland-deciduous shrub. Other vegetative types listed were deciduous river bottoms and cultivated lands. Ponds were considered portions of major vegetative types in which they occurred.

Representative species were selected for these five vegetative types based on the following factors: 1) information available on habitat requirements; 2) a good indicator of habitat quality and/or represents a group of other species; and 3) economically important.

Individual sample sites were selected from a table of random numbers. Two digit numbers were selected corresponding to ranges and townships. All habitat types within the selected section were sampled. Additional samples were taken as time permitted to increase sampling reliability. At each sample site the following information was listed: 1) unit numbers, 2) general vegetative types, 3) date, 4) legal description, 5) subtypes, and 6) evaluator's name. Each habitat component was rated on a scale of 1-10 (10 being the best and 1 the worst). Criteria with interval values of 1, 4, 7 and 10 are described in Appendix Tables 2-B through 2-G for the seventeen species sampled.

Assignment of values 1-10 for individual criteria was based on a combination of observations and actual measurements. Periodic measurements were taken to verify observations, thus maintaining confidence in evaluation. Then two overall values were listed. The first was a biological judgment from the evaluating team and the second was the numerical average of the listed criteria. If differences of more than 2.5 units existed between the two overall values, reasons for this were documented on the field sheets. The two values were generally comparable. Where discrepancies occurred, ratings were modified based on both the actual rating and the biologist's comments. The total number of sample values was averaged for each species by individual criteria and overall value for respective vegetative types. For example, in the sage-greasewood-grassland, all mule deer values for condition of browse were summed and divided by the number of samples to get a value of 4.9 (Appendix Table 2-h). In the same manner all overall mule deer values in this type were summed and divided by the number of samples to get a value of 4.7.

The terms poor, fair, good, and excellent are referred to through the narrative in relation to HEP criteria. The four terms indicate the following range of HEP values: poor, 1.0-2.5; fair, 2.6-5.0; good, 5.1-7.5; and excellent, 7.6-10.0.

These terms could be applied to individual criteria or overall values. If a species was evaluated in more than one vegetative type, a weighted average was derived based on the percentage of the respective habitat type in which the species was found. For example, in the ponderosa pine-juniper type (Appendix Table 2-h), the overall value for sharp-tailed grouse was 4.5, and in the grassland deciduous shrub type it was 5.6. The ponderosa pine-juniper type occupies approximately 35 percent of the refuge, while the grassland-deciduous shrub type occupies about 2 percent of the area. Since the ponderosa pine-juniper type covers about 17 times more area, the value used for sharp-tailed grouse was derived as follows:

$$\begin{aligned}\text{Sharp-tailed grouse value} &= \frac{(4.5 \times 17) + (5.6 \times 1)}{18} \\ &= 4.56 \\ &= 4.6 \\ &= \text{fair}\end{aligned}$$

Appendix Table 2a. List of vegetative types (as consolidated for Habitat Evaluation Procedures) on Charles M. Russell National Wildlife Refuge, Montana.

- Sagebrush - greasewood - grassland
  - big sagebrush
  - silver sage
    - bottomlands
    - sandy upland sites
  - halophytic shrubs
    - greasewood bottomlands
    - greasewood grasslands
    - shadscale
- Ponderosa pine - juniper
  - ponderosa pine
  - juniper
  - Douglas fir
- Grassland - deciduous shrub
  - tall shrubs - buffaloberry
  - shorter shrubs - rose and snowberry
- Riparian - deciduous river bottom
  - Missouri River
  - other streams
- Cultivated Lands
  - hayland
  - dryland
- Ponds

Appendix table 2b. Sagebrush-greasewood-grassland vegetative type on Charles M. Russell National Wildlife Refuge, Montana.

Sage grouse habitat criteria and rating values

-10- Interspersion of grass and sage with areas of dense big sage (20-39 percent canopy cover) for use by adults throughout the year (Wallestad 1971, Eng and Schladweiler 1972). Areas of moderate big sage (10-15 percent) for use by broods (Wallestad 1971 and Klebenow 1969). Sage 10-24 inches in height for use throughout the year (Dalke et al. 1963, Martin 1970, Wallestad 1971). Ground cover has 10-15 percent canopy cover of forbs in spring and summer (professional judgment). Water within one mile (professional judgment and inference by Patterson 1952).

-7- Interspersion of dense and moderate big sage for adults and broods as above. Sagebrush is 6-16 inches high. Forbs comprise less than 10 percent of ground cover in spring and summer. Water 1-1.5 miles away.

-4- No interspersion of dense big sage and moderate big sage. Sage less than 12 inches in height. Forbs comprise less than 5 percent of the ground cover in summer. Alfalfa fields available within the area (professional judgment). Water 2-3 miles.

-1- Big sagebrush very scattered and less than 10 inches tall. Forbs almost nonexistent. Alfalfa fields heavily used. Water greater than 3 miles away.

Golden eagle habitat criteria and rating values

-10- Large tracts (1000 acres or larger) of sage-grassland for hunting (McGahan 1968). Cliffs and/or rock outcrops for nesting (Snow 1973, Boecker and Ray 1971). Perch sites available in the form of snags and/or rock outcrops (Jackman and Scott 1975). Sage-grassland with a mixture of sage and grass species that provide cover for rodent populations (professional judgment). No human disturbance within 1 mile (Snow 1973, Fish and Wildlife Service 1976, Boecker and Ray 1971).

-7- Tracts of sage-grassland 500-1000 acres in size. Rock outcrops are more limited, but some large cottonwoods occur for nesting. Sage-grassland lacks good mixture of sage and grasses resulting in smaller rodent populations. Human disturbance within 1/2 mile of nest.

-4- Small tracts of sage-grassland (250-500 acres) located adjacent to ponderosa pine forest. Sage-grassland lacks rock ledges for nesting and perching. Ponderosa pine provides some nest sites. Sage-grassland has vegetation less than 8 inches tall resulting in poor cover for rodents. Human disturbance within 1/4 mile.

-1- Sage-grassland is less than 250 acres in size. No nest sites available in the sage-grassland. Sage-grassland vegetation is less than 5 inches high. Continual human disturbance occurs.

Pronghorn habitat criteria and rating values

-10- Sage-grassland with a mixture of big sage, silver sage, snowberry, rose, and rabbitbrush (Couey 1946). Succulent forbs available in spring and summer (Hoover et al. 1959). Silver sage abundant in coulee bottoms and adjacent benches for feeding in winter (D. Pyrah personal communication). Sagebrush canopy cover of 10-24 percent for use throughout the year, and 20 percent or greater for fawning (Bayless 1969, D. Pyrah personal communication). Rolling terrain marked by depressions, ridges, flats, benches, and some breaks (Rouse 1959, Hoover et al. 1959). Sagebrush 1-1.5 feet tall (Einarsen 1948, and Severson 1966).

-7- Sage-grassland with 2-3 species of shrubs as listed above. Forbs available in spring. Silver sage less abundant than above. Sage canopy cover is a maximum of 15 percent for all uses. Sage less than 1 foot tall. Terrain is gently rolling but without depressions and breaks.

-4- Sage-grassland of mostly big sage. Forbs available in wet years. Alfalfa fields used in summer (Cole 1956). Silver sage very restricted for winter use. Sagebrush canopy cover is 10 percent or less for all seasons of use, 1.5-2 feet tall. Terrain quite flat; lacking little if any topographic relief.

-1- Rank growth of sagebrush over three feet in height or sage extremely sparse. Terrain extensively flat.

Mule deer habitat criteria and rating values

-10- Big sage, rubber, and green rabbitbrush abundant for winter use (Mackie 1970). Species are in good-excellent condition with little or no hedging (Mackie 1970). Forbs, such as wild onion, biscuitroot, and especially yellow sweet clover available in summer and fall (Mackie 1970). Other shrubs present include skunkbrush, rose, snowberry, and creeping juniper (may include some Rocky Mountain juniper) (Mackie 1970, Allen 1968). Topographic relief in the form of cuts, ravines, and/or juniper patches for hiding cover (professional judgment). Land is deeply dissected (professional judgment).

-7- Big sage and rabbitbrushes abundant for winter use. Fair-good condition with some hedging. Same forbs present, but yellow sweet clover is restricted for use. Skunkbrush and juniper present. Topographic relief is less pronounced. No deep dissection of the land. Less juniper for hiding cover.

-4- Only big sage present for winter use. It is in fair-good condition with moderate hedging. Few forbs present. Little sweet clover. Scattered skunkbrush. Rolling hills. No deep dissected land. Sparse juniper cover.

-1- Scattered sage in poor condition and badly hedged. Very few forbs. No sweet clover. Lack other palatable browse species. Land is flat to gently rolling. No rugged escape cover.

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1 = poor, 4 = fair, 7 = good and 10 = excellent

Appendix Table 2c. Ponderosa pine-juniper vegetative type on Charles M. Russell National Wildlife Refuge, Montana.

Red-tailed hawk habitat criteria and rating values

-10- Ponderosa pine forest that is open (canopy cover less than 30 percent) (Bent 1937, Jackman and Scott 1975, modified by professional judgment) and adjacent to areas of sage-grassland. Trees 20-30 feet tall and 8-10 inches DBH for nesting (Bent 1937, Jackman and Scott 1975, modified by professional judgment). Sage-grasslands has good mixture of sage, grass, and forb species as cover for prey population (professional judgment).

-7- Ponderosa pine has 30-45 percent canopy closure. Adjacent sage grassland is 300-400 acres in size. Trees 15-20 feet tall, 6-7 inches DBH. Sage-grassland in fair condition as cover for prey population.

-4- Ponderosa pine forest having 45-60 percent canopy closure. Adjacent to smaller sage-grassland (less than 300 acres). Trees 10-15 feet tall and 4-5 inches DBH. Grassland in good condition, but little or no sagebrush.

-1- Dense ponderosa pine forest (greater than 60 percent canopy cover). No sage-grassland for hunting.

Elk habitat criteria and rating values

-10- Long narrow coulees that are highly dissected and contain mesic sites with dense conifer cover at their head (B. Campbell personal communication). Dense juniper thickets for calving, hunting security, and shade (B. Campbell personal communication). Abundant mesic coulees for feeding summer and fall (B. Campbell personal communication). Small to moderately extensive ridgetops dominated by big sage-western wheatgrass in good-excellent condition for winter-spring use (Mackie 1970). Water source every section (B. Campbell personal communication).

-7- Fewer long narrow coulees as above. Less dense juniper thickets. Rolling topography. Some mesic sites and/or yellow sweet clover patches for feeding summer and fall. Ridgetops as above in fair-good condition for winter-spring use. Water source every two sections.

-4- No coulees as above. No juniper thickets. Rolling topography. Few mesic coulees and/or clover patches. Winter-spring areas in poor-fair conditions. Water sparsely distributed.

-1- Lack of topographic relief and vegetative cover. Lack of palatable grasses and forbs. Lack of water.

Sharp-tailed grouse habitat criteria and rating values

-10- North slopes with 10-12 inches of effective residual grass cover for nesting (Christenson 1971, Sisson 1976). Shrub crown cover of 30-45 percent in coulees (Grange 1948, Ammann 1957). Shrub coulees with serviceberry, chokecherry, snowberry, wild rose, and buffaloberry (Sisson 1976, Nielsen 1978). Shrubs having all terminal leaders alive (professional judgment). Grasses and forbs abundant and in good condition between forest areas (Edminster 1954, and professional judgment).

-7- North slopes with 8-10 inches effective residual grass cover. Shrub crown cover 45-60 percent in coulees. Same shrub species. Shrubs with 75 percent of terminal leaders alive. More grasses and less forbs between forest areas.

-4- North slopes have effective residual grass cover of 6-8 inches high. Shrubs in coulees with 20-30 percent crown cover. Some deciduous species present but mostly juniper. Deciduous shrubs somewhat decadent (50 percent of terminal leaders alive). Understory sparsely vegetated.

-1- Residual grass cover less than 6 inches tall. Only juniper present and in good condition. Grading into sage-grassland.

Porcupine habitat criteria and rating values

-10- Ponderosa pine forest with a semi-open canopy (30-60 percent) (Costello 1966 and professional judgment). Trees 7 inches or greater DBH and 15-20 feet high (Marshall et al. 1962). Herbaceous material comprises about 50 percent of the ground cover (Costello 1966 and professional judgment). Some heavy brush, rock piles, or other suitable dense cover is available within the habitat for denning (Costello 1966).

-7- Ponderosa pine forest with less than 30 percent canopy cover. Herbaceous material composes 25-50 percent of the ground cover. Clumps of dense brush and/or rock outcrops are quite scattered.

-4- Ponderosa pine forest with dense canopy cover (greater than 60 percent). Trees more than 30 feet tall. Less than 25 percent herbaceous ground cover. Single scattered bushes and few rock outcrops.

-1- Dense ponderosa pine forest; ground cover is primarily pine needles. No brush or rock outcrops.

Mountain bluebird habitat criteria and rating values

-10- Ponderosa pine forest that has less than 30 percent canopy cover (Jackman and Scott 1975) and two or more snags/acre with cavities for nesting (Balda 1975). Ground cover is less than 2 feet high (Miller 1970).

-7- Ponderosa pine forest with as much as 60 percent canopy cover. Still has several cavities for nesting. Ground cover is up to 3 feet high.

-6- Juniper present but grass less than 2 feet tall.)

-4- Ponderosa pine forest with as much as 75 percent canopy closure. Few nesting cavities occur. Ground cover is over 3 feet high.

-1- Closed ponderosa pine forest. Greater than 75 percent canopy cover. No nesting cavities. Heavy shrub understory.

Bobcat habitat criteria and rating values

-10- Forest canopy closure 45-60 percent (professional judgment). Moderate brush understory (difficult to see through but can be walked through) (Sampson 1967). Scattered rock outcrops and ledges (Rollings 1945). This forest may also be adjacent to coulees filled with juniper and sagebrush (Young 1958).

-7- Canopy closure 30-45 percent and forest understory is becoming dense (difficult to walk through). Dense clumps of scattered juniper may also occur.

-4- Open forests, less than 30 percent canopy cover. Light shrub understory. Few rock outcrops. Coulees have little juniper or sage.

-1- Scattered trees. Herbaceous understory. No rock outcrops.

Mule deer habitat criteria and rating values

-10- Interspersion of ponderosa pine with patches of sage-grassland on smaller ridgetops, and along margins of more extensive ridges with sage abundant in these areas for winter use (Mackie 1970). Forbs (especially yellow sweet clover) and skunkbrush available in summer and fall (Mackie 1970, Allen 1968). Shrubs, including big sage and rubber rabbitbrush, available in winter, in good condition with no hedging (Mackie 1970).

-7- Interspersion of ponderosa pine with patches of sage-grassland along major ridgetops and sage abundant. Yellow sweet clover available in summer. Skunkbrush very sparse. Big sage and rubber rabbitbrush available in winter in fair condition with some hedging.

-4- Interspersion of ponderosa pine with some patches of sage-grassland along major ridgetops and sage scattered. Yellow sweet clover very scarce as is skunkbrush for summer and fall use. Big sage available in winter in poor condition with moderate hedging.

-1- Ponderosa pine on moderate slopes with no sage-grassland interspersed. Few palatable forbs or shrubs as above. Those present are in very poor condition and heavily hedged.

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1 = poor, 4 = fair, 7 = good and 10 = excellent

Appendix Table 2d. Grassland-deciduous shrub vegetative type on the Charles M. Russell National Wildlife Refuge, Montana.

Sharp-tailed grouse habitat criteria and rating values

-10- North slopes with 10-12 inches of effective residual grass cover for nesting (Christenson 1971, Sisson 1976). Shrub coulees of 30-45 percent crown cover (Grange 1948, Ammann 1957) and 6-12 feet high for brooding and roosting (Sisson 1976, Nielsen 1978). Shrubs are mostly serviceberry, chokecherry, snowberry, wild rose, and buffaloberry (professional judgment). Grasses and forbs abundant and in good condition between shrub areas (Edminster 1954 and professional judgment).

-7- North slopes with 8-10 inches of effective residual grass cover. Shrub coulees of 45-60 percent crown cover and 6-8 feet high. Same shrub species plus junip. Deciduous shrubs with 75 percent of terminal leaders alive. More grasses and less forbs, still in good condition.

-4- North slopes with 6-8 inches of effective residual grass cover. Coulees with more scattered shrubs (20-30 percent crown cover). Shrubs 4-6 feet tall. Two-three shrub species present that have 25-50 percent of terminal leaders alive. Understory sparsely vegetated.

-1- North slopes with 3-4 inches of effective residual grass cover. Shrubs very scattered in coulees (less than 10 percent crown cover). One or two species less than 2 feet tall. Shrubs decadent with less than 25 percent of leaders alive.

Mourning dove habitat criteria and rating values

-10- Large grain or weed fields within 1 mile of deciduous shrub area (Edminster 1954, Moore and Pearson 1941). Shrub crown cover 30-60 percent in scattered clumps (professional judgment). Shrub areas within 4 miles of water (McClure 1943).

-7- Only road edges available for feeding. These areas are within 1 mile of shrub areas. Shrub crown cover 10-30 percent in scattered clumps. These areas are up to 5 miles from water.

-4- Only grassland available as seed source. These feeding areas are more than 2 miles from shrub areas. Shrub crown cover is less than 10 percent and these areas are up to 6 1/2 miles from water.

-1- No seed source. Shrub crown cover less than 5 percent in coulees. Water is 8+ miles away.

Mule deer habitat criteria and rating values

-10- Shrubby areas with shrubs 5-6 feet high in patches of 800-1600 feet in length for hiding and fawning. (Thomas et al. 1976). Shrubs for winter food source include juniper, snowberry, rose, chokecherry, and sagebrush (Kufeld et al. 1973, Mackie 1970). These plants have 75 percent or more of current year's growth retained through the winter (professional judgment). Forbs abundant (15 percent of the ground cover) (K. Hamlin personal communication, Kufeld et al. 1973). Topographic relief in the form of cuts, ravines, and rolling hills (professional judgment).

-7- Shrubby areas with shrubs 2-6 feet high in patches of 200-800 feet in length for hiding and fawning. Shrubs for winter food are the same as above. These plants retain 50-75 percent of current year's growth through the winter. Forbs 10 percent of the ground cover. Topographic relief is less pronounced, no deep cuts or ravines.

-4- Shrubby areas less than 2 feet in height are quite scattered and smaller than 200 feet in length. Shrubs for winter food include juniper, rose, and sagebrush. These species are not abundant and retain 25-50 percent of current year's growth through the winter. Forbs 5 percent of the ground cover. Only gently rolling hills for topographic relief.

-1- No shrub patches large enough to provide hiding cover. Only sagebrush and juniper available for winter food. Few forbs occur. Flat to rolling sage-grasslands.

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1 = poor, 4 = fair, 7 = good and 10 = excellent

Appendix Table 2e. Riparian, deciduous river bottom vegetative type on the Charles M. Russell National Wildlife Refuge, Montana.

Raccoon habitat criteria and rating values

-10- Deciduous tree stand of large, mature trees within 500 feet of water (professional judgment, Stuewer 1943, Giles 1942). Average height of trees over 55 feet (Stuewer 1943). Average DBH of trees, 25 inches (Stuewer 1943). Denning trees, or their potential, available at rate of 4+ per 15-20 acres (Stuewer 1943). Trees within 0.5 mile of cultivated cropland, if available (Caras 1967).

-7- Deciduous trees stand with 20-30 percent large mature trees. Stand within 800 feet of water. Average height of trees 38 feet. Average DBH of trees 18 inches. Denning trees, or their potential, available at rate of 2 per 15-20 acres. Trees 1.25 miles from cultivated cropland, if available.

-4- Young deciduous tree stand. Stand within 1200 feet of water. Average height of trees 20 feet. Average DBH of trees 10 inches. No denning trees available but ground-den sites available.

-1- No trees or just saplings. Over 1,600 feet from water. No den sites.

White-tailed deer habitat criteria and rating values

-10- River bottom with overstory of continuous large mature cottonwoods (Mussehl and Howell (ed.) 1971). Shrub understory that is dense and difficult to walk through (professional judgment). Palatable browse species like snowberry, chokecherry, cottonwood, green rabbitbrush, serviceberry, and red osier dogwood present and less than 6 feet tall (Allen 1968). Plants retain 75 percent or more of current year's growth through the winter (Young and Payne 1948). Openings scattered through river bottom (McCaffery and Creed 1969). Coulees of deciduous shrubs within sight of the river bottom (professional judgment). Include bottoms numbered 16-20 from the mouth of the reservoir (K. Hamlin personal communication and professional judgment).

-7- River bottom with overstory of large mature cottonwoods that are not continuous. Shrub understory that is moderately dense and can be walked through. Three-four palatable browse species (as listed above) within 6 feet of ground level. Plants retain 50-75 percent of current year's growth through the winter.

Occasional openings throughout the river bottom. Include bottoms numbered 11-15 from mouth of the reservoir.

-4- River bottom with cottonwood overstory occurring as clumps of scattered trees. Light shrub understory, one-two palatable browse species as listed above within 6 feet of ground level. Plants retain 25-50 percent of current year's growth through the winter. Agricultural fields adjacent to river bottom. Include bottoms 6-10 from mouth of the reservoir.

-1- River bottom with no overstory, and only very scattered shrubs. Large proportion of annuals compose ground cover. Include bottoms 1-5 from mouth of the reservoir.

Eastern kingbird habitat criteria and rating values

-10- Mature deciduous forest contiguous to river system for perch sites (Manolis 1973). Understory of trees and shrubs 6-10 feet high for nesting (Graber et al. 1974, Davis 1955). These areas are surrounded by open country used for feeding (Graber et al. 1974).

-7- Shrubs and young trees contiguous to a stream bank. Open country surrounds water system.

-4- Scattered mature deciduous trees contiguous to river system. Lack of shrub-small tree understory. Open country is not nearby.

-1- Shrubby coulees not within site of river bottom. These coulees lack water. Open country is not nearby.

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1 = poor, 4 = fair, 7 = good and 10 = excellent

Appendix Table 2f. Cultivated lands vegetative type on the Charles M. Russell National Wildlife Refuge, Montana.

American kestrel habitat criteria and rating values

-10- Agricultural fields adjacent to cottonwood river bottoms (Eyre and Paul 1973). Cottonwoods should be mature with cavities for nesting (Olendorff 1973). Suitable perch sites available. This could include fence posts, power lines, rocks, or boulders (Roest 1957).

-7- Agricultural fields adjacent to coulees with ash or cottonwood trees. Trees are mature but not of cavity-bearing size. Perch sites are also more restricted.

-4- Agricultural fields on upland sites adjacent to grasslands and/or ponderosa pine trees without suitable nest sites. Few suitable perch sites occur.

-1- Extensive, rolling grassland. No trees or rock outcrops for nesting or perching.

Mourning dove habitat criteria and rating values

-10- Cultivated fields within 1 mile of coulees containing deciduous shrubs and/or river bottoms (Edminster 1954, Moore and Pearson 1941). Shrubby coulees and river bottom forest should be semi-open (30-60 percent canopy cover) (professional judgment). Distance to water is 4 miles or less (McClure 1943).

-7- Cultivated fields within 1 mile of sage-grassland or deciduous shrub coulees. Shrub crown cover is 10-30 percent. Water is up to 5 miles away.

-4- Cultivated fields more than 2 miles from sage-grassland or deciduous shrub coulees. Shrub coulees are quite scattered, and shrub crown cover is less than 10 percent. Water is up to 6 1/2 miles away.

-1- No cultivated fields. Only very scattered shrubs or trees. Water is 8 miles or more away.

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1 = poor, 4 = fair, 7 = good and 10 = excellent

Appendix Table 2g. Ponds (evaluated in whatever vegetative type it occurred in) on the Charles M. Russell National Wildlife Refuge, Montana.

Muskrat habitat criteria and rating values

-10- Water level stable throughout the year (Errington 1948, 1963). Water gradually increasing to a maximum depth of 4 feet (Sather 1958, Errington 1948). Emergent vegetation (particularly cattail and bulrush) growing over 1/2 of surface area in a scattered pattern (Errington 1963). Shoreline beyond emergent vegetation completely stable and vegetation 12 inches high (Errington 1963, inference, and professional judgment).

-7- Water level fluctuations annual and of one foot or less. Water depth gradually increasing to a maximum of three feet. Emergent vegetation growing on half of the area of just along shoreline. Shoreline stable and in good condition but vegetation short (6-12 inches high).

-4- Water level fluctuations frequent throughout the year and of more than one foot. Water depth 1-2 feet. Emergent vegetation covers 25 percent or less of the surface. Shoreline damaged and/or vegetation very short (less than 6 inches high).

-1- Water level fluctuations extreme (over 5 feet), resulting in dry and flood conditions which either exposes or inundates lodges and dens or water depth of pond less than 1 foot. No emergent vegetation. shoreline only bare ground with no vegetation.

General waterfowl habitat criteria and rating values

-10- Pond is at least 5 acres (466 feet in diameter) at low water in late summer (Crissey 1968). Submerged aquatic vegetation covers entire bottom of pond (professional judgment). Emergent vegetation (bulrush and cattail) cover 1/2 surface area of pond in a scattered pattern (professional judgment). Herbaceous upland vegetation, including brush if present, within 150 feet of the pond is 1.5+ feet tall and 75+ percent ground cover (Bent 1923, Bennet 1938, Burgess et al. 1965, Drewien and Springer 1969). Pond contains at least one island for goose nesting (Geis 1956, Sherwood 1968, Pakulak 1969).

-7- Pond is 3.5 acres (390 feet in diameter) at low water in late summer. Submerged aquatic vegetation covers 75 percent of bottom. Emergent vegetation covers 1/2 surface area of pond in mostly a block or band. Herbaceous/brushy upland vegetation is 1 foot tall and has 60 percent ground cover. Only muskrat houses available for goose nesting.

-4- Pond is 2 acres (332 feet in diameter) at low water in late summer. Submerged aquatic vegetation covers 25 percent of bottom. Emergent vegetation is only around 1/2 of the pond edge. Herbaceous/brush upland vegetation is 6-12 inches tall and has 30 percent ground cover. Peninsula of land for goose nesting.

-1- Pond dries up every summer. Little or no submerged aquatic vegetation present. No emergent vegetation present. Upland vegetation is mostly herbaceous of less than 3 inches height and the shoreline area is bare ground. Only shoreline available for goose nesting.

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1 = poor, 4 = fair, 7 = good and 10 = excellent

Appendix Table 2h. Wildlife habitat ratings by major habitat type on Charles M. Russell National Wildlife Refuge, Montana.

Vegetative type, wildlife species, and criteria	Individual criteria rating	Overall rati
Sagebrush-greasewood-grassland		
Sage grouse		4.2
canopy cover of sage	4.3	
sage height	6.4	
canopy cover of forbs	5.0	
distance to water	8.7	
alfalfa fields	3.8	
Golden eagle		5.5
tract size	9.0	
suitable perch/nest sites	5.3	
cover for rodent population	5.3	
human disturbance	7.7	
Pronghorn		5.1
mixture of shrubs & grass	4.7	
forb availability	5.6	
silver sage availability	4.6	
sage canopy cover	5.1	
sage height	7.5	
topography	7.2	
Mule Deer		4.7
winter browse	4.9	
condition of browse	5.5	
forb-summer & fall	5.7	
other shrubs	4.9	
topography relief	6.3	
Ponderosa pine-juniper		
Red-tailed hawk		6.0
forest canopy cover	8.7	
adjacent sage/grassland	9.0	
tree size-nesting/perching	7.7	
cover for prey	4.9	

Elk		6.0
coulee availability	6.5	
juniper cover	6.7	
topography	7.8	
feeding sites	5.5	
water availability	8.3	
Sharp-tailed grouse		4.5
north slope residual cover	3.8	
shrub crown cover	4.1	
shrubby coulees	3.9	
understory quality	5.2	
Porcupine		6.2
forest canopy cover	8.6	
tree size	8.3	
ground cover	5.7	
denning sites	6.2	
Mountain bluebird		6.0
forest canopy cover	8.8	
nesting cavities	5.3	
ground cover height	7.5	
Bobcat		5.0
forest canopy cover	5.6	
understory density	4.9	
rock outcrops and ledges	2.5	
coulee cover	4.9	
Mule deer		5.5
interspersion-pine/sage/grass	5.5	
summer/fall food-forbs & shrubs	5.1	
winter food-shrubs	5.5	
Grassland-deciduous shrub		
Sharp-tailed grouse		5.6
height of shrubs	6.0	
north slope residual cover	4.9	
shrub crown cover	5.0	
shrubby coulees	7.0	
grass/forbs	7.6	
Mourning dove		5.4
seed source availability	5.2	
shrub crown cover	6.2	
distance to water	9.9	

Mule deer		6.1
shrub height	8.6	
shrub patch size	4.4	
winter browse species	6.8	
forb abundance	5.6	
topography	6.8	
Riparian - deciduous river bottom-Missouri River		
Raccoon		7.2
distance of trees to water	8.3	
height and DBH of trees	7.6	
denning tree availability	7.4	
distance to cropland	6.9	
White-tailed deer		6.2
overstory density	7.8	
understory density	6.2	
browse availability	5.4	
availability of openings	7.0	
Eastern kingbird		8.1
tree size and density	8.9	
understory	6.9	
availability of open country	9.6	
Riparian - deciduous, river bottom-other streams		
Raccoon		6.6
distance of trees to water	7.2	
height and DBH of trees	7.2	
denning tree availability	7.4	
distance to cropland	7.8	
White-tailed deer		4.2
overstory density	5.5	
understory density	4.0	
browse availability	3.4	
availability of openings	7.5	
Eastern kingbird		6.5
tree size and density	7.0	
understory	5.6	
availability of open country	10.0	
Cultivated lands		
American kestrel		6.5
adjacent land type	6.8	
nesting cavity availability	6.0	
perch availability	7.8	

Mourning dove		7.3
distance to interspersed land	7.9	
canopy cover-forest or shrub	6.6	
distance to water	10.0	
Ponds		
Muskrat		4.0
water stability	6.8	
water depth	7.5	
emergent vegetation abundance	3.2	
shoreline stability & vegetation	4.6	
Waterfowl		3.4
pond size	3.9	
submerged aquatic vegetation	3.2	
emergent vegetation	3.0	
upland vegetation	3.8	
goose nesting sites	3.8	

0.0-2.5 = poor, 2.6-5.0 = fair, 5.1-7.5 = good and 7.6-10.0 = excellent

Appendix 3. Memorandum of agreement between District Engineer, Omaha District, Corps of Engineers, and Area Manager, Billings Area Office, Fish and Wildlife Service, for the Charles M. Russell National Wildlife Refuge and Fort Peck Lake Project, Montana.

The U.S. Fish and Wildlife Service and the U.S. Army Corps of Engineers recognize the National, Regional, and Local importance of natural resources contained within the Charles M. Russell National Wildlife Refuge and the Fort Peck Lake Project, Montana, hereinafter called the Area. Both agencies also recognize the public interest can be best served through coordinated planning and management efforts to maximize opportunities for conserving these resources and minimize the adverse impacts associated with the management actions of the respective agencies.

The parties to this Memorandum of Agreement agree to coordinate, cooperate, and, when appropriate, jointly develop resource management plans and other actions.

The Omaha District Engineer of the Corps of Engineers and the Billings Area Manager of the Fish and Wildlife Service will develop mechanisms necessary to insure that implementation of all actions are in consonance with agreements contained herein.

In each phase of planning and future management and in the formulation of proposals for the preservation, conservation, management, and/or development of the natural resources within the Area, both agencies will consult and identify potential actions which could have adverse or beneficial impacts on the executive and legislative mandated responsibilities of each agency. Both agencies agree to coordinate efforts at the field operating level to resolve these potential areas of conflict and to modify the potential actions to the extent permitted by each agency's policies and regulations, and applicable laws.

It is further recognized by both agencies that the natural resources in the Area should be made available for public enjoyment and appropriate recreation provided that public use and associated developments do not adversely affect fish and wildlife and their habitats and will be operated in a generally natural setting compatible with the Missouri River Breaks Ecosystem.

Date 17 July 1979

(signed) V. D. Stipo
V. D. Stipo
Col., Corps of Engineers
Omaha District Engineer

Date 11 July 1979

(signed Wally Steucke
Wally Steucke
Area Manager *
Billings Area Office
U.S. Fish and Wildlife Service

* The Billings Area Manager position no longer exists. Functions of that office are now under the Regional Office of U.S. Fish and Wildlife Service in Denver, Colorado.

Appendix 4. Executive Order 7509 establishing the Fort Peck Game Range, Montana (legal description of land not included).

By virtue of and pursuant to the authority vested in me as President of the United States and by the act of June 25, 1910, ch. 421, 36 Stat. 847, as amended by the act of August 24, 1912, ch. 369, 37 Stat. 497, and subject to the conditions therein expressed and to all valid existing rights, it is ordered that the following described lands, insofar as title thereto is in the United States, be, and they are hereby, withdrawn from settlement, location, sale, or entry and reserved and set apart for the conservation and development of natural wildlife resources and for the protection and improvement of public grazing lands and natural forage resources: Provided, That nothing herein contained shall restrict prospecting, locating, developing, mining, entering, leasing, or patenting the mineral resources of the lands under the applicable laws: Provided further, that any lands within the described area which are otherwise withdrawn or reserved will be affected hereby only insofar as may be consistent with the uses and purposes for which such prior withdrawal or reservation was made: And provided further, That upon the termination of any private right to, or appropriation of, any public lands within the exterior limits of the area included in this order, or upon the revocation of prior withdrawals unless expressly otherwise provided in the order of revocation, the lands involved shall become part of this preserve:

(Legal Description available in FWS office Lewistown, Montana.)

This range or preserve, insofar as it relates to conservation and development of wildlife, shall be under the joint jurisdiction of the Secretaries of the Interior and Agriculture, and they shall have power jointly to make such rules and regulations for its protection, administration, regulation, and improvement, and for the removal and disposition of surplus game animals, as they may deem necessary to accomplish its purposes, and the range or preserve, being within grazing districts duly established pursuant to the provisions of the act of June 28, 1934, ch. 865, 48 Stat. 1269, as amended by the act of June 26, 1936, Public No. 827, 74th Congress, shall be under the exclusive jurisdiction of the Secretary of the Interior, so far as it relates to the public grazing lands and natural forage resources thereof: Provided, however, That the natural forage resources therein shall be first utilized for the purpose of sustaining in a healthy condition a maximum of four hundred thousand (400,000) sharp-tailed grouse, and one thousand five hundred (1,500) antelope, the primary species, and such nonpredatory secondary species in such numbers as may be necessary to maintain a balanced wildlife population, but in no case shall the consumption of forage by the combined population of the wildlife species be allowed to increase the burden of the range dedicated to the primary species: Provided further, That all the forage resources within this range or preserve shall be available, except as herein otherwise provided with respect to wildlife, for domestic livestock under rules and regulations promulgated by the

Secretary of the Interior under the authority of the aforesaid act of June 28, 1934, as amended: And provided further that Land within the exterior limits of the area herein described, acquired, and to be acquired by the United States for the use of the Department of Agriculture for conservation of migratory birds and other wildlife, shall be and remain under the exclusive administration of the Secretary of Agriculture and may be utilized for public grazing purposes only to such extent as may be determined by the Said Secretary to be compatible with the utilization of said lands for the purposes for which they were acquired as aforesaid under regulations prescribed by him.

The reservation made by this order supersedes as to the above-described lands the temporary withdrawal for classification and other purposes made by Executive Order No. 6910 of November 26, 1934, as amended.

This preserve shall be known as the Fort Peck Game Range.

Franklin D. Roosevelt

The White House,
December 11, 1936.

(No. 7509)
(F.R. Doc. 3825-Filed, December 15, 1936; 2:30 p.m.)

Appendix 5. Federal stocking levels in AUMs under each management alternative (livestock) for the Charles M. Russell National Wildlife Refuge, Montana.

Number and name	Total federal AUMs available to livestock and wildlife	No Action (Present Situation)		Proposed Action		Intensive Wildlife Management		Multiple Use		No Grazing	
		1990	2005	1990	2005	1990	2005	1990	2005	1990	2005
1. Antelope Creek	1013	207 435 nonuse	207 435 nonuse	262	262	69	77	262	350	105	0
2. E. Slippery Ann	3891	1602	1602	794	794	534	575	1602	1800	801	0
3. Rock Creek	3275	1465 199 nonuse	1465 199 nonuse	1021	1021	488	519	146	1800	733	0
4. Nichols Coulee	7794	5181	5181	3637	3637	1862	1999	3900	4500	2591	0
5. Beauchamp Creek	3073	488	488	488	488	267	312	488	550	244	0
6. Fourchette Creek	116	84	84	17	17	0	0	58	58	0	0
7. N. Hawley Creek	112	11	11	11	11	0	0	11	11	0	0
8. Telegraph Creek	1272	757	757	676	676	252	281	757	757	379	0
9. UL Bend	1747	1080	1080	1080	1080	360	385	874	1150	540	0
10. Box Elder #3	58	54	54	47	47	18	30	29	47	0	0
11. Box Elder	247	199	199	102	102	66	66	124	140	100	0
12. Kill Woman	840	336	336	336	336	112	141	280	400	168	0
13. Larb Hills	2680	420	420	420	420	140	193	930	930	210	0
14. Carpenter Creek	3655	2736	2736	1451	1451	912	1243	1828	2000	1368	0
15. Cabin Coulee	2530	2044	2044	1163	1163	681	785	1265	1600	1022	0
16. 7 Point	5197	1919	1919	1633	1633	650	730	2588	2700	960	0
17. Silver Dollar	545	656	656	348	348	210	210	273	350	328	0
18. Skunk Coulee/Mud Creek 1/	2979	1056	1056	1056	1056	352	390	1488	1500	528	0
19. Duck Creek	683	395 41 nonuse	395 41 nonuse	350	350	145	166	342	360	198	0
20. Fort Peck Common	634	224 14 nonuse	224 14 nonuse	186	186	79	108	317	320	112	0
21. Bear Creek	910	430	430	430	430	143	149	455	480	215	0
22. Bobcat Creek	1193	586 744 nonuse	586 744 nonuse	631	631	358	493	600	650	165	0

Appendix 5 . (Cont'd.)

23.	Spring Creek	680	163	163	437	437	225	303	340	450	82	0
			511 nonuse	511 nonuse								
24.	Sand Arroyo/Rock Creek[1/]	467	542	542	291	291	181	241	234	400	271	0
			2 nonuse	2 nonuse								
25.	Rock Creek	386	437	437	200	249	146	293	193	300	219	0
					49 nonuse							
26.	Bug Creek	1054	986	986	712	862	332	458	527	900	493	0
			10 nonuse	10 nonuse	150 nonuse							
27.	Nelson Creek	2158	1791	1791	1282	1282	597	625	1079	1300	896	0
28.	Pine Coulee	44	28	28	0	0	0	0	22	22	0	0
29.	Big Dry	1146	912	912	758	758	304	468	573	900	456	0
30.	Snap Creek	892	1033	1033	634	634	344	356	446	700	517	0
31.	Lone Tree	453	276	276	353	353	184	208	227	360	138	0
			276 nonuse	276 nonuse								
32.	Coyote Basin	1667	1846	1846	1144	1144	615	784	833	1500	923	0
33.	Box Creek	1815	936	936	936	936	312	479	908	1000	468	0
34.	Norville Creek	505	395	395	373	373	132	357	253	400	198	0
35.	Spring Draw	499	353	353	283	283	118	118	250	353	177	0
36.	Sage Creek Point	996	343	343	578	578	241	241	500	600	172	0
			380 nonuse	380 nonuse								
37.	Penick Coulee	1014	833	833	650	650	278	278	507	700	417	0
38.	Gilbert Creek	3752	3676	3676	1605	1605	1225	1507	1876	3000	1838	0
39.	Points Pasture	402	668	668	279	279	223	223	201	300	334	0
40.	Crooked Creek	3089	1932	1932	1523	1523	644	744	1545	1700	966	0
41.	Hell Creek	3621	2255	2255	1807	1807	752	928	1810	2000	1128	0
42.	Brownie Butte	642	525	525	202	202	175	186	321	400	263	0
43.	Snow Creek	2282	1371	1371	1223	1223	459	626	1141	1370	686	0
			6 nonuse	6 nonuse								
44.	Hill Coulee	755	583	583	465	465	194	234	378	500	292	0
45.	Billy Coulee	6	11	11	4	0	0	0	3	6	0	0
46.	Billy Creek	627	355	355	229	229	118	162	313	355	178	0
47.	Slaymaker	73	115	115	0	0	0	0	36	45	0	0
			2 nonuse	2 nonuse								
48.	7 Blackfoot	1418	730	730	463	463	243	276	709	730	365	0
49.	Herman Ridge	190	80	80	80	80	27	36	95	95	0	0

Appendix 5. (Cont'd.)

50. Devils Creek Common	1463	559	559	430	530	209	226	500	730	280	0
		68 nonuse	68 nonuse	100 nonuse							
51. Ghost Coulee	568	249	249	238	238	83	109	284	300	125	0
52. Deadman Coulee	407	405	405	229	229	135	163	203	260	203	0
53. Lost Creek	1280	599	599	599	599	200	244	640	675	300	0
54. Grass Coulee	1895	1218	1218	867	867	406	542	950	1200	609	0
55. Germaine Coulee	1553	900	900	650	650	300	346	776	850	450	0
56. 79 Trail	563	142	142	142	142	47	53	200	200	71	0
57. Deer Coulee	1307	1141	1141	378	378	380	413	650	700	571	0
58. Soda Creek	3298	1888	1888	1011	1011	897	998	1649	1700	944	0
		804 nonuse	804 nonuse								
59. Musselshell Trail	1992	1081	1081	462	462	360	392	986	1081	541	0
60. Hansen Flat	663	325	325	284	284	108	128	331	400	163	0
61. E. Indian Butte	3472	1977	1977	1180	1180	659	872	1736	1800	989	0
62. W. Indian Butte	1169	547	547	428	428	213	305	585	650	774	0
		92 nonuse	92 nonuse								
63. Mobridge	41	35	35	26	0	0	0	20	30	0	0
64. 2 Calf	679	305	305	281	256	102	102	298	305	151	0
					25 nonuse						
65. Judith River	65	48	48	16	16	0	0	32	40	0	0
Unalloted Areas											
UL Bend	11694	0	0	0	0	2434	2434	7000	7500	0	0
Timber Creek	356	0	0	0	0	0	0	0	0	0	0
Rock Creek	797	0	0	0	0	265	265	0	0	0	0
River Bottoms	775	0	0	0	0	258	258	0	0	0	0
Sheep Pasture	722	0	0	0	0	0	0	0	0	0	0

1/ Allotments #18 (Skunk Coulee/Mud Creek) and #24 (Sand Arroyo/Rock Creek) are each two separate allotments assigned to one operator; the number of allotments on CMR totals 67.

Appendix 6. Public Law 94-223 94th Congress, H.R. 5512, February 27, 1976.

AN ACT

To amend the National Wildlife Refuge System Administration Act of 1966, and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That subsection (a) of section 4 of the National Wildlife Refuge System Administration Act of 1966 (16 U.S.C. 668dd (a) is amended to read as follows:

National Wildlife Refuge System Administration Act of 1966, amendments.
"National Wildlife Refuge System."

"(a)(1) For the purpose of consolidating the authorities relating to the various categories of areas that are administered by the Secretary of the Interior for the conservation of fish and wildlife, including species that are threatened with extinction, all lands, waters, and interests therein administered by the Secretary as wildlife refuges, areas for the protection and conservation of fish and wildlife that are threatened with extinction, wildlife ranges, game ranges, wildlife management areas, or waterfowl production areas are hereby designated as the 'National Wildlife Refuge System' (referred to herein as the 'System'), which shall be subject to the provisions of this section, and shall be administered by the Secretary through the United States Fish and Wildlife Service. With respect to refuge lands in the State of Alaska, those programs relating to the management of resources for which any other agency of the Federal Government exercises administrative responsibility through cooperative agreement shall remain in effect, subject to the direct supervision of the United States Fish and Wildlife Service, as long as such agency agrees to exercise such responsibility.

Transfer or disposal of lands, restriction.

"(2) No acquired lands which are or become a part of the System may be transferred or otherwise disposed of under any provision of law (except by exchange pursuant to subsection (b)(3) of this section) unless--

"(A) the Secretary of the Interior determines with the approval of the Migratory Bird Conservation Commission that such lands are no longer needed for the purposes for which the System was established; and

"(B) such lands are transferred or otherwise disposed of for an amount not less than--

"(i) the acquisition costs of such lands, in the case of lands of the System which were purchased by the United States with funds from the migratory bird conservation fund, or fair market value, whichever is greater; or

"(ii) the fair market value of such lands (as determined by the Secretary as of the date of the transfer or disposal), in the case of lands of the System which were donated to the System.

Appendix 6. (Cont'd.)

Pub. Law 94-223 February 27, 1976

The Secretary shall pay into the migratory bird conservation fund the aggregate amount of the proceeds of any transfer or disposal referred to in the preceding sentence.

"(3) Each area which is included within the System on January 1, 1975, or thereafter, and which was or is--

"(A) designated as an area within such System by law, Executive order, or secretarial order; or

"(B) so included by public land withdrawal, donation, purchase, exchange, or pursuant to a cooperative agreement with any State or local government, any Federal department or agency, or any other governmental entity, shall continue to be a part of the System until otherwise specified by Act of Congress, except that nothing in this paragraph shall be construed as precluding--

"(i) the transfer or disposal of acquired lands within any such area pursuant to paragraph (2) of this subsection;

"(ii) the exchange of lands within any such area pursuant to subsection (b)(3) of this section; or

"(iii) the disposal of any lands within any such area pursuant to the terms of any cooperative agreement referred to in subparagraph (B) of this paragraph."

Approved February 27, 1976.

LEGISLATIVE HISTORY:

HOUSE REPORT No. 94-334 (Comm. on Merchant Marine and Fisheries).
SENATE REPORT No. 94-593 (Comm. on Commerce).
CONGRESSIONAL RECORD:
Vol. 121 (1975): Nov. 14, considered and passed House.
Vol. 122 (1976): Feb. 4, considered and passed Senate, amended.
Feb. 17, House concurred in Senate amendment.

Appendix 7. Soils limitations and capability classes, Charles M. Russell National Wildlife Refuge, Montana.

Soil limitations

The following soil mapping units on the refuge should not be grazed (W. Larsen personal communication):

13	Badlands
24E	Dilts Clay
48	Rock Outcrop
50	Shale Outcrop
77	Beach Sand
88	Riverwash
195F	Cabbart-Rock Outcrop complex, 15-90 percent slopes
241	Dilts-Badlands complex, 15-45 percent slopes
243	Dilts-Shale Outcrop complex, 4-45 percent slopes
249E	Neldore (saline phase)-Dilts-Shale Outcrop complex, 15-45 percent slopes
505F	Shale Outcrop-Neldore (saline phase) complex, 15-45 percent slopes
507F	Shale Outcrop-Dilts complex, 45-60 percent slopes

In addition, those mapping unit complexes having badlands, rock outcrop, or shale outcrop included were recognized as having limitations in that no forage allocations should be allotted to the badlands, rock outcrop, or shale portions (Appendix Table 7a). It was recognized that those complexes containing rock outcrop or shale outcrop could provide limited grazing on the remainder of the mapping unit. No AUMs for wildlife or livestock were calculated for the following: rock outcrop, shale outcrop, beach sand, riverwash, and portions of those complexes containing one of the above as a component. A shortened time frame for completion of the EIS did not allow for examination and elimination of all mapping units listed in Appendix Table 7a. Most notable of the omitted mapping units are others including the Dilts series, a commonly represented soil complex component on the refuge.

The problem of soils limitations for grazing was analyzed and resolved in the following manner: it was recognized that certain soils should support no livestock grazing; however, it would be impractical and costly to fence these individual areas to prevent livestock use. Exclusion of an entire area from use because of soils limitations on only a portion of the area is not feasible. A practical way to solve the problem would be to recognize that soils limitations do exist, that it is nearly impossible to deny livestock use or wildlife use, but that overall stocking rates should be adjusted accordingly.

Soil capability classes

Capability grouping shows, in a general way, suitability of soils for most land uses. Groups are made according to limitations of the soils when used for field crops, risk of damage when they are used, and the way they respond to treatment. The grouping does not take into account major and generally expensive land forming that would change slope, depth, or other characteristics of the soils, nor possible but unlikely major reclamation projects, and does not apply to rice, cranberries, horticultural crops, or other crops requiring special management.

Those familiar with the capability classification can infer from it much about the behavior of soils when used for other purposes, but this classification is not a substitute for interpretations designed to show suitability and limitations of groups of soils for range, forest trees, or engineering.

In the capability system, all soils are grouped at three levels: capability class, subclass, and unit. In this report, only the first two levels are given for each mapping unit, since soils on CMR are not generally used for crops.

Capability classes, the broadest groups, are designated by Roman numerals I through VIII. The numerals indicate progressively greater limitations and narrower choices for practical use, defined as follows:

Class I-few limitations restricting use.

Class II-moderate limitations that reduce choice of plants or that require moderate conservation practices.

Class III-severe limitations that reduce choice of plants, require special conservation practices or both.

Class IV-very severe limitations that reduce choice of plants, require very careful management or both.

Class V-not likely to erode but have other limitations, impractical to remove, that limit use largely to pasture, range, woodland, or wildlife.

Class VI-severe limitations that make them generally unsuited to cultivation and limit use largely to pasture, range, woodland, or wildlife.

Class VII-very severe limitations that make them unsuited to cultivation and that restrict use largely to pasture, range, woodland, or wildlife.

Class VIII-limitations that preclude use for commercial plants and restrict use to recreation, wildlife, water supply, or esthetic purposes.

Capability subclasses are soil groups within one class: they are designated by adding a small letter, e, w, s, or c to the class numeral: for example, IIe. The letter e shows that the main limitation is risk of erosion unless close-growing plant cover is maintained, w shows that water in or on the soil interferes with plant growth or cultivation (in some soils the wetness can be partly corrected by artificial drainage), s shows that the soil is limited mainly because it is shallow, salty, droughty, or stony, and c, used in only some parts of the United States, shows that the chief limitation is climate that is too cold or dry.

In class I, there are no subclasses because soils of this class have few limitations. Class V can contain, at most, only subclasses indicated by w, s and c because soils in Class V are subject to little or no erosion, though they have other limitations that restrict use largely to pasture, range, woodland, wildlife, or recreation.

Appendix 7. (Cont'd.)

Appendix Table 7 a. **Soils mapping units having grazing limitations on the Charles M. Russell National Wildlife Refuge, Montana.**

Mapping unit name	Mapping unit number	Approximate acreage by county Valley	Fergus	McCone	Petroleum	Phillips	Garfield	Total
Badlands[1]	13	4219		4147			2267	10,633
Beach sand[1]	77						19	19
Cabbart-Rock Outcrop complex, 15-90% slopes	195F					3102	10,280	13,382
Cabbart-Yawdim-Rock Outcrop complex, 15-45% slopes	197F					472	627	1099
Dilts clay, 8-25% slopes	24E				958	800		1758
Dilts-Badlands complex, 15-45% slopes[1]	241			848		215		1063
Dilts-Badlands-Bascovy complex, 15-45% slopes	242E					29	499	528
Dilts-Neldore-Shale Outcrop complex 8-45% slopes	382	23,214	29,364		1353	27,966	1756	83,653
Dilts-Shale Outcrop complex, 4-45% slopes	243				548	18,965	271	19,784
Dilts-Yamac-Badlands complex, 15-45% slopes	246			1509			270	1779
Kobar-Yawdim-Shale Outcrop complex, 8-25% slopes	365D						589	589
Lambeth-Badlands complex, 15-60% slopes	371			681				681
Neldore (saline phase)-Bascovy-Shale Outcrop complex, 8-25% slopes	389E					7074	250	7324
Neldore (saline phase)-Dilts-Shale Outcrop, complex, 15-45% slopes	249E	23,654			1155	2676	546	28,031

Appendix Table 7a. (Cont'd.)

Neldore-Dilts-Shale Outcrop complex, 8-60% slopes	386F				5132	14,649	690	20,471
Neldore-Shale Outcrop-Bascovy complex, 15-60% slopes	384E				1235	3266	14,702	19,203
Neldore-Shale Outcrop complex, 15-60% slopes	387F		6	8	7928	16,821	1744	26,499
Riedel-Delphill-Rock Outcrop complex, 25-60% slopes	465F						724	724
Riedel-Rock Outcrop complex, 25-60% slopes	463F					2430	1321	3751
Riverwash1/	88				162	324		486
Rock Outcrop1/	48					39	3335	3374
Shale Outcrop1/	50	14,054			80	121	514	14,769
Shale Outcrop-Dilts complex, 45-60% slopes1/	507F					1198		1198
Shale Outcrop-Neldore complex, 25-60% slopes	506F					2107	402	2509
Shale Outcrop-Neldore (saline phase) complex 15-45% slopes1/	505F					11,877		11,877
Yawdim-Badlands-Cambeth complex, 15-60% slopes	611			237			379	616
Yawdim-Rock Outcrop-Cabbart complex, 15-60% slopes	613F				56	36	17,147	17,239
Yawdim-Shale Outcrop complex, 15-45% slopes	618E					20	447	467
Yetull-Riedel-Rock Outcrop complex 25-60% slopes	622F						2961	2961
Yawdim-Badlands-Gerdrum complex, 15-60% slopes	612				88	90	1578	1756
	Total							298,223

1/ Class VIII lands unsuitable for livestock grazing. The remaining mapping units are recognized as being capable of supporting limited livestock grazing.

Appendix 8. Range survey methodology and productivity, Charles M. Russell National Wildlife Refuge, Montana.

METHODOLOGY

A range site and condition survey was conducted on CMR in 1978 by four range specialists. The survey was in accordance with the 1976 SCS National Range Handbook.

Soils mapping was done prior to the range survey in accordance with standard soil survey procedures. Mapping procedures consisted of identifying known soil series or complexes and mapping these units on 1:24000 aerial photographs. Once the soils mapping was completed for a given area, range/soils specialists devised a correlation key for mapping range sites on the basis of soils units. Range site mapping units are based upon soils mapping units but are expressed in terms of general soils features, instead of series names and slope gradients used in standard soil survey procedures. For example, a soil identified as an Absher clay loam, 0-4 percent slopes in the soil survey would be considered a dense clay range site for purposes of range survey procedures. This key, which contains all range site/soils mapping units present on the refuge, is on file in the refuge headquarters in Lewistown.

Range sites and condition classes for all lands within the refuge above the high water mark of Fort Peck Reservoir, 2,250 feet msl, were mapped on 1:24000 scale aerial photographs. The range sites were then tallied by site and condition class acreages for all sections within the refuge by FWS. These range site summaries are also on file in Lewistown. Following the acreage tabulations, each section was assigned to a precipitation zone and geographic location, and initial stocking rates were tabulated in terms of total AUMs/section in accordance with the SCS Montana Grazing Guides. This stocking rate is based upon the amount of forage that can be taken during normal or average years and still maintain or improve the range condition. Recommended stocking rates are obtained by examining the soil's properties, which are fundamental to this inventory system and the basis for naming a given range site, and upon geographic and topographic features and climate (precipitation). The recommended stocking rates assume that reasonably uniform grazing will occur over the entire area. Stocking rate cuts for inaccessibility because of topography or lack of water are not provided in the SCS Montana Grazing Guides and are left to the planner's or manager's knowledge of the area for final stocking rate appropriations (Appendix 15).

Clipping studies on pristine sites resulted in information which lends insight to the productivity of these sites at climax and the percent weight composition by species in the climax community. Normally, productivity of different sites is expressed in terms of annual production by air dry weight in favorable years, unfavorable years, and long-term average for sites rated as excellent condition. Comparison of the present range situation expressed as a percentage of the potential at climax provides the observer with an ecological site condition rating.

Appendix Table 8a summarizes expected annual site productivity for range sites commonly found on the wildlife refuge. Data presented are taken from SCS range guides and technical guides and are presented only as general figures for those sites. The information does provide insight as to how soils limitations such as depth, texture, and salinity problems affect vegetative productivity. Additional information regarding site productivity has been collected by Prodgers in response to differences in precipitation (Appendix Table 8b).

Criticisms concerning this survey were particularly directed toward the fact that 1978 was an abnormally high moisture year. Vegetative production was much greater than normal on the refuge. Critics of the survey indicated that perhaps this biased the range condition upward and provided a distortion that range conditions were better than the actual situation.

It should be stated that range condition determined by SCS methods is based upon percent by weight of the current year's growth (actual air-dry measurements or estimates) of each species in the community and the percent that should be present in a climax situation. The high moisture year of 1978 would have provided as realistic a situation as one of drought: annual weeds would normally not grow at all during an exceptionally dry year, whereas they would be abundant in wet years. Perennial grasses, forbs, and shrubs would be less affected because of better adapted root systems. Rates of vegetative production in perennial species would be less likely to show the extreme fluctuations shown by annuals during years of high or low rainfall.

Through the summer, periodic clipping evaluations were made to verify range survey results. No major discrepancies were found.

RANGE SITES AND CONDITION

There are many differences in soils and climate of the survey area. For these reason, there are several different kinds of rangeland. These different kinds of rangeland are called range sites. The best adapted group of plants is called the potential or climax community for the site. The climax plant community for a site varies slightly from year to year, but the kinds and percentage of plant composition remain about the same if undisturbed. Each range site has the ability to produce a different kind and/or amount of climax vegetation than any other range site.

The original or climax combination of plants fitted the soil and climate of the site so perfectly that other kinds of plants could not move in unless the area was disturbed. So consistent is the relationship between plants, climate, and soil, that the climax plant community can be predicted even on a severely disturbed site if the soil is identified.

Range conservationists and soil scientists, working together, group soils which naturally grow the same climax plant communities into range sites.

Repeated overuse by grazing animals, excessive burning, or plowing result in changes in the kinds, proportions, or amounts of climax plants in the plant community. Depending on the kind and degree of disturbance, some kinds of plants increase while others decrease. If disturbance is severe, plants which do not belong in the climax plant community may invade. Plant response to grazing use depends on the kind of grazing animal, season of use, and how closely the plant is grazed. Under good management, near-climax plant communities can be maintained or, in the case of disturbed vegetation, the climax plant community will be gradually reestablished unless the soils have been seriously eroded.

Plants are categorized into decreasers, increasers, or invaders according to their response to grazing pressures.

Decreasers are climax dominant plants that tend to decrease in relative amounts under close grazing. They are generally the most productive and most palatable to grazing animals.

Increasers are plants in the climax vegetation that increase in relative amounts as the more desirable decreaser plants are reduced by close grazing. They are generally less palatable, woody, spiny, or so short they escape close grazing.

Invaders are weedy type plants or exotics that cannot stand the competition of climax vegetation. They fill the void if the climax plants are diminished or eliminated by disturbance.

Range condition is an expression of the present kind of vegetation in relation to the climax plant community for that site. The more nearly the present kinds and amounts of plants are like the climax plant community, the higher the range condition.

A range is in excellent condition if 76-100 percent of the vegetation is of the same kinds as the climax stand. It is in good condition if the percentage is 51-75. It is in fair condition if the percentage is 26-50, and in poor condition if the percentage is less than 25.

The present range condition provides an index to changes which have taken place in the plant community. More importantly, however, range condition is a basis for predicting the kinds and amounts of changes in the present plant community which can be expected from management and treatment measures.

Thus, the range condition rating indicates the nature of the present plant community, and the climax plant cover for the range site represents a goal toward which rangeland management may be directed.

Knowledge of climax plant communities of range sites and the nature of present plant communities in relation to their potential is important in planning and applying conservation on rangeland. Such information is the basis for selecting management objectives, design of grazing systems, managing for wildlife, determining potential for recreation, and for rating watershed conditions.

Any management objective on rangeland must provide for a plant cover which will adequately protect or improve the soil and water resources and meet the needs of the operator. This usually involves increasing desirable plants and restoring the plant community to near climax conditions. Sometimes, however, a plant cover somewhat below climax will better fit specific grazing needs or wildlife habitat while still protecting soil and water resources.

All range sites respond favorably to proper grazing use and systems of grazing deferments.

LEGEND FOR RANGE SITES

Range sites are kinds of rangeland that differ from each other in their ability to produce a significantly different kind or amount of climax or original vegetation. Only natural grasslands are classified as range sites. To fully designate a range site, a soil-group name is combined with the precipitation (pz) zone and geographic location; e.g. sandy 10-14" pz; glaciated plains, Montana.

The following range soil-groups are listed in presumed order of natural productivity, considering total air-dry weight of all herbage produced through the entire year by all seed plants/unit of area, in ordinary years under climax plant cover.

Range site descriptions:

I. Soil groups that can produce more herbage than ordinary range upland because of plainly superior soil moisture availability.

WL- wet land: lands where seepage, ponding, etc., raise the water table to above the surface during only a part of the growing season. Too wet for cultivated crops but too dry for common reed, cattails, or true aquatics.

Sb - subirrigated: lands with an effective subsurface ground water table and water rarely over the surface during the growing season.

SL - saline lowland: subirrigated and overflow lands where salt tolerant plants occur over a major part of the area.

Ov - overflow: areas regularly receiving more than normal soil moisture because of run-in or stream overflow.

II. Soil groups with no obvious soil or moisture limiting factors. The vegetation can make a normal response to climate.

Sa - sands: sands and loamy sands more than 20 inches deep.

Sy - sandy: coarse to fine sandy loams more than 20 inches deep.

Si - silty: soils more than 20 inches deep of very fine sandy loam, loam, or silt loam. This includes soils with 2 inches or more of silt loam over clayey subsoils.

Cy - clayey: granular clay loam, silty clay loam, silty clay, sandy clay, or clay more than 20 inches deep.

III. Soil groups with characteristics or topographic features that limit moisture-holding capacity or affect infiltration rates.

TH - thin hilly: loamy or clayey soils on steep or hilly landscapes with a thin A horizon and weak or no structure in the subsoil but with significant root penetration deeper than 20 inches; usually calcareous but contain less than 15 percent calcium carbonate.

St - stony: soils more than 20 inches deep with cobbles or stones occupying 40-80 percent of the surface.

Ly - limy: soils more than 20 inches deep that are nearly white and very limy (15 percent or more calcium carbonate) within 4 inches of the surface.

SwC - shallow clay: shallow granular clay soils that are 10-20 inches deep to underlying shale or nearly impervious clays.

SwG - shallow to gravel: soils that are 10-20 inches deep to sandy gravel. Few roots penetrate deeper than 20 inches.

Sw - shallow: soils 10-20 inches deep to hard rock or softbeds of decomposed granite, siltstone, or sandstone; few roots penetrate deeper than 20 inches.

Ps - panspots: areas of silty, clayey, or sandy soils in complex with shallow depressions of hard clays or other nearly impervious materials at or near the surface. The shallow depressions occupy 20-50 percent of the site.

DC - dense clay: relatively impervious deep nongranular clays - may be overlain by thin ineffectual layers of other materials: the dispersed layer is very hard to extremely hard when dry and very sticky when wet.

TB - thin breaks: mixed soils of various depths with hard rock or other resistant bed outcroppings at different levels on steep irregular slopes: trees may occur locally above outcrops.

Gr - gravel: coarse textured soils with more than 50 percent gravel and cobbles underlain by loose sand and gravel at less than 20 inches.

VS - very shallow: areas where few roots can penetrate deeper than 10 inches. Outcropping of gravel or bedrock is characteristic: joints in bedrock may develop deep soil pockets usually marked by tall grasses, shrubs, or stunted trees.

SU - saline upland: soils more than 20 inches deep with salt and/or alkali accumulations: salt tolerant plants occur over a major part of the area.

Sh - shale: readily puddled uplands where some unweathered angular raw shale fragments are exposed at the surface and little, if any, soil profile development is evident.

Bl - badlands: nearly barren lands broken by drainages intermingled with small grazable areas.

Appendix 8. (Cont'd.)

Appendix Table 8a. Site productivity of selected range sites on the Charles M. Russell National Wildlife Refuge, Montana.[1]

Range site	High favorable years (lbs./acre)	Low unfavorable years (lbs./acre)	Average (lbs./acre)
Overflow	3,000	2,000	2,500
Saline lowland	3,500	2,000	3,000
Sandy	2,000	1,000	1,600
Silty	1,800	1,000	1,500
Clayey	1,800	900	1,300
Thin hilly	1,450	850	1,200
Shallow clay	1,200	700	1,000
Shallow to gravel	1,200	700	1,000
Shallow	1,100	600	900
Panspots	1,200	700	1,000
Dense clay	1,100	600	900
Thin breaks	1,100	600	900
Shale	500	300	400
Saline upland	600	350	500
Badlands	500	300	400

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[1] 10-14 inches ppt zone. Expected annual production, air dry weight (excellent condition site).

Appendix 8. (Cont'd.)

Appendix Table 8b. Comparison of aerial production in 1977 and 1978 on Upper Nelson Creek, approximately 12 miles east of the Charles M. Russell National Wildlife Refuge, Montana.[1]

Community	1977 production (lbs./acre)	1978 production (lbs./acre)	1977:1978 production
Little bluestem	748	934	1.25
Silver sagebrush/ western wheatgrass/ blue grama	712	1,801	2.53
Little bluestem-bluebunch wheatgrass	498	1,025	2.06
Blue grama threadleaf sedge/needle-and-thread	361	1,148	3.86
Bluebunch wheatgrass/ blue grama-threadleaf	331	1,143	3.45
Needle-and-thread-western wheatgrass/ blue grama	297	1,264	4.25
Needle-and-thread/blue grama-threadleaf sedge	194	1,015	5.23
Western wheatgrass/ blue grama	180	1,488	8.28
Blue grama	176	692	3.93
Blue grama/western wheatgrass	14	1,740	122.00

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[1] Data from R. Prodgers 1979.

Appendix 9. Range condition class breakdown by livestock operator and allotment on the Charles M. Russell National Wildlife Refuge, Montana.

Permittee's name	Allotment	Allotment size (acres)	Allotment range condition class (%)			
			Poor	Fair	Good	Excellent
Mitchell	Antelope Creek	10,065	01	02	97	00
Schwenke	" "	10,065	01	02	97	00
"	East Slippery Ann	26,556	00	04	96	00
Square Butte Grazing Assoc.	" " "	26,556	00	04	96	00
Square Butte Grazing Assoc.	Antelope Creek	10,065	01	02	97	00
Kelsey	Rock Creek	27,843	04	05	91	00
Peters	" "	27,843	04	05	91	00
Robinson	Nichols Coulee (#3)	51,865	04	11	83	02
"	" " (#4)	51,865	01	02	72	25
Nesbit	Beauchamp Creek	19,755	00	00	67	32
Matovich, J.	N. Hawley Creek	1,064	00	00	45	55
" "	Fourchette Creek	585	00	00	00	100
Wiederrick Brothers	Telegraph Creek	10,269	03	01	94	02
" "	UL Bend	11,149	10	07	73	10
Kluck	Box Elder (#3)	599	00	25	75	00
"	Box Elder	2,366	00	09	88	03
Koss Brothers	Larb Hills	20,220	00	00	03	97
Barnard	Kill Woman	8,486	05	07	82	06
Etchart	Carpenter Creeek	36,127	01	03	79	17
Burke	Cabin Coulee	19,459	15	25	55	05
Wittmayer Grazing Assoc.	Seven Point	38,701	00	00	83	17
Silver Dollar Grazing Assoc.	Silver Dollar	5,740	00	00	100	00
Eide	Skunk Coulee/Mud Creek	20,137	00	00	83	17
Lenz	Duck Creek	8,213	00	00	100	00
Skyberg Brothers	Fort Peck common	2,974	00	19	81	00
Yager, M.	" " "	2,974	00	19	81	00
Yager, G.	" " "	2,974	00	19	81	00

Appendix 9. (Cont'd.)

Nickels, R.	Bear Creek	5,407	00	11	89	00
Nickels, L.	" "	5,407	00	11	89	00
Bennett	Bobcat Creek	10,113	00	03	96	01
Webb Estate	" "	10,113	00	03	96	01
Pointer	" "	10,113	00	03	96	01
Boucher	Spring "	6,469	00	43	57	00
Rosenwald	Bobcat "	10,113	00	03	96	01
"	Spring "	6,469	00	43	57	00
Blevins & Wright	Bobcat "	10,113	00	03	96	01
Fergueson	Sand Arroyo/Rock Creek	4,372	00	51	47	02
Nelson	Rock Creek	5,811	00	54	46	00
Collins	Bug "	8,731	02	33	61	04
Twitchell, J.	Nelson "	13,310	01	22	57	20
Paine	Pine Coulee	241	00	00	100	00
McKerlick	Big Dry	9,528	00	15	66	19
Twitchell, W.	Snap Creek	7,033	00	52	47	01
Taylor	Lone Tree	2,532	00	20	80	00
Boughton (sold to Coldwell 1979)	Coyote Basin	12,493	00	14	86	00
Henning	Box Creek	10,767	00	00	73	27
Edwards, K.	Norville Creek	4,059	00	01	44	55
Edwards, L.	Spring Draw	3,886	00	13	62	25
Pinkerton Brothers	Sage Creek Point	5,439	00	00	30	70
Isaacs	Penick Coulee	5,866	00	00	35	65
Murnion	Gilbert Creek	26,749	00	21	59	20
Coldwell	" "	26,749	00	21	59	20
"	Points Pasture	3,370	00	53	47	00
Cole	Gilbert Creek	26,749	00	21	59	20
Hays	Crooked Creek	19,856	00	05	74	21
Binion	Hell Creek	25,990	00	05	51	44
Trumbo	Brownie Butte	4,063	00	00	24	76

Appendix 9. (Cont'd.)

Buffington	Snow Creek	14,933	00	02	40	58
West	Hill Coulee	8,997	00	01	67	32
Coulter	Billy "	510	00	02	44	54
McKeever	Billy Creek	10,162	00	00	55	44
Watt	Slaymaker	1,634	00	00	22	78
Wilson	Seven Blackfoot	12,096	00	04	87	09
Loomis, E.	Herman Ridge	1,805	00	00	100	00
"	Devils Creek common	9,935	00	16	81	03
Loomis, D.	Herman Ridge	1,805	00	00	100	00
"	Devils Creek common	9,935	00	16	81	03
Stafford	" " "	9,935	00	16	81	03
Phipps Brothers	" " "	9,935	00	16	81	03
" "	Ghost Coulee	4,101	00	00	88	12
Huston	Deadman Coulee	3,011	00	00	81	19
Pierson	Lost Creek	9,025	00	02	89	09
Six-X Ranch	Grass Coulee	15,022	00	00	76	24
Matovich, M.	Germaine Coulee	12,446	00	09	88	03
Marks	79 Trail	3,806	00	00	36	64
Two Crow Land & Cattle	Deer Coulee	11,861	00	10	68	22
Two Crow Land & Cattle	Soda Creek	22,746	00	02	98	00
Two Crow Land & Cattle	Musselshell Trail	16,635	00	01	98	01
Harris	Soda Creek	22,746	00	02	98	00
Nunn	" "	22,746	00	02	98	00
"	Musselshell Trail	16,635	00	01	98	01
Hedman	" "	16,635	00	01	98	01
Rindal, D.	Hanson Flat	4,160	00	04	92	04
"	E. Indian Butte	26,055	00	01	98	01
Rindal, O.	" " "	26,055	00	01	98	01
Cimrhakl, D.	" " "	26,055	00	01	98	01
Cimrhakl, F.	" " "	26,055	00	01	98	01
Holland	" " "	26,055	00	01	98	01
Irish, G.	" " "	26,055	00	01	98	01

Appendix 9. (Cont'd.)

Komarek, G.	E. Indian Butte	26,055	00	01	98	01
"	Mobridge	702	00	43	39	18
"	W. Indian Butte	12,720	00	08	75	17
Komarek, J.	E. " "	26,055	00	01	98	01
"	W. " "	12,720	00	08	75	17
Komarek, R.	E. " "	26,055	00	01	98	01
McNulty	E. " "	26,055	00	01	98	01
"	W. " "	12,720	00	08	75	17
Mathison (leased to Jordan)	E. " "	26,055	00	01	98	01
Willmore, W.	" " "	26,055	00	01	98	01
Zahn, A.	" " "	26,055	00	01	98	01
Zahn, W.	" " "	26,055	00	01	98	01
Zahn, E. (leased to J. Willmore)	" " "	26,055	00	01	98	01
Irish, D.	W. " "	12,720	00	08	75	17
Murray	" " "	12,720	00	08	75	17
Umstead	" " "	12,720	00	08	75	17
Norskog	" " "	12,720	00	08	75	17
"	Two Calf	5,594	00	00	85	15
Demars	Judith River	1,016	00	46	54	00

Appendix 10. Direct economic impacts of changes in livestock forage supplies - livestock businesses that use the Charles M. Russell National Wildlife Refuge.

The purpose of this analysis is to estimate direct economic impacts on livestock producers from changes in forage allocations on the Charles M. Russell National Wildlife Refuge. Although sheep and horses use the refuge, cattle account for over 90 percent of the livestock grazed. A little over 40,000 head of cattle use the refuge to obtain an average of about 13 percent of their annual nutrient requirements. The grazing season is predominately spring-summer-fall with some winter grazing.

Procedures

Procedures for estimating economic impacts include 1) grouping producers by size of operation; 2) preparing cost and return budgets for each group; and 3) measuring impacts on businesses with the use of linear programming models.

Producers are stratified into four groups based on estimated herd size:

Size Group	Producers
0-99	12
100-199	19
200-299	19
300 and over	37
Total	87

Enterprise budgets in Appendix Tables 10a-d present costs and returns for each size group using 1979 as the base year. Production and price assumptions shown in the tables are representative for the area based on producer estimates and USDA published production data. Costs other than feed are unpublished USDA numbers taken from field surveys and indexed to account for inflation. Interest on operating capital assumes funds are in use six months at the Production Credit Associations's average annual interest rates. Interest on investment is based on Federal Land Bank rates. General Farm Overhead includes utilities, professional fees, organization dues, and other items not used exclusively for livestock productions.

The analysis of impacts assumes several things: 1) that annual feed sources are limited to those currently available on the ranches: 2) that rental or purchase of pasture is not possible; and 3) that the cost of shipping hay into the area makes this alternative prohibitive. Therefore, reductions in herd size and reallocation of present feed supplies are considered the only mitigating actions available to producers.

In the Linear Programming models, impacts are first estimated for each herd size group (Appendix Tables 10j-m). Included is a wide range of adjustments which may occur within each group. Weighted average and aggregate adjustments summarized in Appendix Table 10e are derived from these size group analyses. Aggregate direct producer impacts shown in Appendix Table 10e are annual estimates which must be multiplied by years in the planning period to derive total projects impacts. Aggregate impacts are measured in terms of changes in gross income, cash expenditures, return above cash costs (net income), cattle numbers, and labor use.

The Linear Programming Approach generated a $12.87 per AUM value of the CMR forage to the CMR permittees. This value was thus utilized as an integral part of the Linear Programming Approach. For a discussion of these shadow prices or values in a Linear Programming context, see Betters 1977, or any Management Science text.

The analysis indicates that producers would incur a 3 percent reduction in aggregate gross income with the Proposed Action, while the Intensive Wildlife and No Grazing options would trigger a 6 percent and 11 percent reduction, respectively. Change in gross income with the Multiple Use alternative would be small - down less than 1 percent. Aggregate gross income effects of the Proposed Action alternative seem to be relatively small.

Aggregate net income changes or returns above cash costs are more pronounced for the alternative management systems. Reductions range from 1 percent with Multiple Use to 12 percent with No Grazing. Net income is the money producers use to pay family living expenses, replace old or worn equipment, and make mortgage payments on borrowed investment capital. A reduction in this variable will adversely affect producers, particularly those with large outstanding debts. Mortgage payments usually have priority in expenditures of net income. Therefore, actions which reduce net income will impact most heavily on dollars available for family use and maintenance of depreciable assets. Average annual dollar reductions per producer with each action are: Proposed Action, $3,057; Intensive Wildlife Management, $5,552; Multiple Use, $690; and No Grazing, $9,724. For individual producers, these values will vary, depending upon the size of the operation. The full implications of these income adjustments cannot be assessed unless information is available relating to producer dependency on livestock for his total livelihood. This kind of data is not available. But it can be assumed that producers who rely solely on cattle for income will be affected more than those with multiple enterprises or off-farm income.

The average herd size for producers using the refuge is about 483 cattle with a range from less than 10 to more than 4,000. Average reductions in herd size with the different alternatives are: Proposed Action, 16 cattle; Intensive Wildlife Management, 29 cattle; Multiple Use, 4 cattle; and No Grazing, 51 cattle. Herd reductions for individual producers will deviate from the average. Herd reductions will cause some diseconomics in the businesses through less efficient use of resources which will cause operating costs per cow to increase. These cost increases are shown on Appendix Table 10f for different reductions in refuge grazing. Part of the cost increases stem from loss of a low cost forage, while part comes from higher fixed cash costs per cow.

Some reductions in labor use and labor efficiency are associated with the alternative management programs on the refuge. Aggregate labor needs decline as follows: Proposed Action, 6.5 man-years; Intensive Wildlife Management, 11.9 man-years; Multiple Use, 1.4 man-years; and No Grazing, 20.9 man-years. The reduction in hired labor is a direct loss of employment. Family labor hours represent a decrease in efficiency since the producer will probably continue with his livestock enterprise but have less work to do with his available time.

Individual Producer Impacts

The discussion above has assessed average impacts for producers as a group. There are differences among individual refuge users which averages cannot identify. Data limitations restrict analysis of these differences. However, these are two which can be considered. Herd size and refuge dependency to annual forage can interact to determine some individual impacts. A distribution of producers based on these criteria is shown in Appendix Table 10g. The percentages indicate that producers with 100-200 cows tend to be more dependent on refuge forage than either very small or very large herds. Some producers in all size groups have high dependencies. There are three small herds with over 50 percent dependency. However, these each have fewer than 11 cattle, so impacts on proposed adjustments in forage will be small. In the 100-199 cattle group, one producer is 74 percent dependent and three producers are 31-50 percent dependent on the refuge. Similarly, the 200-299 cattle group includes one producer 60 percent dependent and two producers 31-50 percent dependent. Among herds of 300 or more cattle are four producers with 31-50 percent dependency.

Impacts on high dependency producers are more severe than the average. Appendix Table 10f illustrates these differences for the Proposed Action. Average reductions in return above cash costs range from $385 for small herds up to $4,900 for large herds. Producers with high dependencies will incur greater losses as indicated in Appendix Table 10h. The example assumes a high dependency of 31 percent. Producers with dependencies above this level will receive proportionately greater impacts.

Appendix 10. Summary of grazing permittee operations and impacts of implementing various alternatives on the Charles M. Russell National Wildlife Refuge, Montana.[1]

Permittee's name	herd size (est.)[2]	Annual total AUMs required (size x 12)	CMR federal AUMs	Federal use on CMR (1979 %)	No Action	Proposed Action	Intensive Wildlife Management	Multiple Use	No Grazing
Mitchell	170C-5H	2160	82	04	Negligible impact for all allotments under this alternative.	Ne	-L	+L	-L
Schwenke	500C	6000	740	12		-L	-L	+L	-L
Square Butte Grazing Assoc.	3158C	37,896	987 active 435 nonuse	03		-L	-M	+L	-H
Kelsey	124C	1488	584	39		-M	-H	+L	-H
Peters	310C-5H	3840	881 active 199 nonuse	23		-M	-H	+L	-H
Robinson	1387C	16,644	5181	31		-M	-M	-L	-M
Nesbit	425C	5100	488	10		0	-L	+L	-L
Matovich, J.	410C	4920	95	02		Ne	-L	Ne	-L
Wiederrick Brothers	800C-10H	9840	1837	19		-L	-H	Ne	-H
Kluck	1000C-6H	12,144	253	02		-L	-L	Ne	-L
Koss Brothers	265C	3180	420	13		+L	-L	+M	-L
Barnard	434C-12H	5496	336	06		0	-L	Ne	-L
Etchart	5640C-50H	68,880	2736	04		-L	-M	-L	-M
Burke	536C-20H	6912	2044	30		-M	-H	-L	-H
Wittmayer Grazing Assoc.	786C-500Y	13,632	1919	14		-L	-M	+L	-M
Silver Dollar Grazing Assoc	675Y	5670	656	12		-M	-M	-M	-M
Eide	265C-2H	3228	1056	33		0	-H	+M	-H
Lenz	112C	1344	395 active 41 nonuse	29		-L	-L	-L	-M
Skyberg Brothers	300C	3600	50	01		-L	-L	+L	-L
Yager, M.	15C	180	76 active 14 nonuse	42		-L	-L	+L	-L
Yager, G.	65C	780	98	13		-L	-M	+L	-M
Nickels, R.)	378C joint herd	4536 joint herd	215 joint	09 joint herd		0	-M	+L	-M
Nickels, L.)			215 herd						
Bennett	62C	744	99	13		-L	-L	-L	-L
Webb Estate	nonuse	0	70 nonuse	00		Ne	Ne	Ne	Ne
Pointer	160C	1920	211	11		-L	-M	-L	-M
Boucher	100C-25H	1800	163	09		-L	-M	-L	-M
Rosenwald	360Y	3024	21 active 1185 nonuse	00		-L	-M	-L	-M

Appendix 10 . (Cont'd.)

Blevins & Wright	unknown	unknown	255	unknown	Negligible impact for all allotments under this alternative.	-L	-M	-L	-M
Ferguson	150C-6H	1944	542 active 2 nonuse	28		-H	-H	-H	-H
Nelson	326C-10H	4152	437	11		-M	-M	-M	-M
Collins	750C-20S	9048	986 active 10 nonuse	11		-M	-M	-M	-M
Twitchell, J.	375C-30H	5220	1791	34		-M	-M	-M	-M
Paine	260C-110S	3384	28	00		-L	-L	Ne	-L
McKerlick	320C-1240S	6816	912	13		-H*	-H	-M*	-H
Twitchell, W.	150C-600S-4H	3336	1033	31		-H	-H	-H	-H
Taylor	110C	1320	276 active 276 nonuse	21		-M	-M	-M	-M
Boughton (sold to Coldwell 1979)*	235C-11H	3084	1846	60		-M	-H	-M	-H
Henning	600C	7200	936	13		0	-M	Ne	-M
Edwards, K.	1100S-10C-2H	2808	395	14		-H*	-H	-M*	-H
Edwards, L.	130C-3H	1632	353	22		-M	-M	-M	-M
Pinkerton Brothers	130C-100Y-15H	2760	343 active 380 nonuse	12		-L	-M	+L	-M
Isaacs	280C-6H	3504	833	24		-L	-M	-L	-M
Murnion	500C	6000	2388	40		-H	-H	-M	-H
Coldwell	1800S-770C-18H	13,992	1379	10		-M	-M	-L	-M
Cole	126C	1512	577	38		-M	-H	-L	-H
Hayes	619C-400S-20H	8868	1932	22		-L	-M	-L	-M
Binion	2500C-250H	36,000	2255	06		-L	-L	-L	-L
Trumbo	360C-150S-5H	4800	525	11		-M	-M	-L	-M
Buffington	309C-6H	3852	1371 active 6 nonuse	36		-L	-M	Ne	-H
West	230C-16H	3144	583	19		-M	-M	-M	-H
Coulter	375C-5H	4620	11	00		-L	-L	Ne	-L
McKeever	205C-6H	2604	355	14		-M	-M	Ne	-M
Watt	250C-12H	3288	115 active 2 nonuse	03		-L	-L	-L	-L
Wilson	258C-7H	3264	730	22		-M	-M	Ne	-H
Loomis, E.	150C-8H	1992	126	06		-L	-M	Ne	-M
Loomis, D.	60C	720	121	17		-L	-M	Ne	-M
Stafford	51C-12H	900	158	18		-L	-M	Ne	-M
Phipps Brothers	200C-10H	2640	483 active 68 nonuse	18		Ne	-M	Ne	-M
Huston	125C-8H	1692	405	24		-M	-M	-H	-M
Pierson	580C-25H	7560	599	08		0	-M	+L	-M
Six-X Ranch	131C-3H	1644	1218	74		-L	-M	Ne	-M

Appendix 10 . (Cont'd.)

Matovich, M.	877C	10,524	900	09	Negligible impact for all allot- ments under this alter- native.	-M	-M	-L	-M
Marks	213C-4H	2652	142	05		Ne	-M	+L	-M
Two Crow Land & Cattle	2360C-15H	28,680	3491	12		-L	-M	-L	-M
Harris	250C-110H	5640	804 nonuse	00		-M	-M	-M	-M
Nunn	300C-8H	3792	489	13		-M	-M	Ne	-M
Hedman	100C-5H	1320	130	10		-L	-M	Ne	-M
Rindal, D.	360C-40H	5280	768	15		-L	-M	Ne	-M
Rindal, O.	200C	1200	52	04		-L	-L	Ne	-L
Cimrhakl, D.)	120C-2H joint	1488	115	26		-L	-M	Ne	-M
Cimrhakl, F.)	ownership		266			-L	-M	-L	-M
Holland	790C-11H	9744	249	03		-L	-L	Ne	-L
Irish, G.	150C-5H	1920	214	11		-L	-M	-L	-M
Komarek, G.	200C	1200	161	13		-H	-H	-L	-H
Komarek, J.	220C-4H	2736	110	34		-L	-L	Ne	-M
Komarek, R.	96C-3H	1224	195	16		-L	-L	Ne	-L
McNulty	35C-1H	444	57	13		-L	-L	Ne	-L
Mathison (leased to Jordan)	8C	96	50	52		-L	-L	Ne	-L
Willmore, W.	250C	3000	127	04		-L	-L	Ne	-L
Zahn, A.	11C	132	67	51		-L	-L	Ne	-L
Zahn, W.	8C	96	50	52		-L	-L	Ne	-L
Zahn, E. (leased to J. Willmore)	76C	912	107	12		-L	-M	-L	-M
Irish, P.	67C-2H	852	81	10		-L	-L	+L	-L
Murray	128C	1536	115	07		-L	-M	+L	-M
Umstead	50C	600	92 nonuse	00		-L	-L	+L	-L
Norskog	350C-3H	4272	405	09		-L	-M	+L	-M
Demars	85C	1020	48	04		-L	-L	Ne	-L

1/ C=cow=1 AUM; H=horse=2 AUMs; S=sheep=.2 AUM; and Y=yearling=.7 AUM. L=low impact; M=moderate impact; H=high impact; O=no impact; +=positive impact; -=negative impact; Ne=negligible.

2/ Information from FWS (1975-79). (Filled out by respective operators; assumed to be correct.)

*Change of livestock class = high impact.

Appendix Table 10 a. Cost and returns, beef cow enterprises with up to 99 head, Charles M. Russell National Wildlife Refuge

Item	Unit	Number	Average weight	Price Cwt	Total Value
Sales:					
Steer calves	Head	23	430	71.23	7,045
Heifer calves	Head	13	410	62.82	3,348
Yearling steers	Head	--	--	--	--
Yearling heifers	Head	4	680	56.02	1,524
Cull cows	Head	5	950	36.99	1,757
Total					13,674
Total/cow					244.18

Cash costs:	Total Value	Value/ Cow
BLM grazing fee	13	.23
Wildlife Refuge	167	2.98
Private range lease/rent	451	8.05
State lease	43	.77
Hay (produce)	1,454	25.96
Hay (purchase)	--	--
Protein supplement	1,814	32.39
Irrigated pasture	--	--
Salt and mineral	149	2.66
Concentrate feeds	--	--
Veterinary and medicine	296	5.29
Hired trucking	92	1.64
Marketing	249	4.45
Fuel and lubricants	798	14.25
Repairs	574	10.25
Land taxes	465	8.30
Other taxes	101	1.80
Insurance	87	1.55
Interest on operating capital	367	6.55
General farm overhead	458	8.18
Other cash costs	--	--
Hired labor	139	2.48
Total cash costs	7,717	137.80
Other Costs:		
Family labor	2,185	39.02
Depreciation	1,665	29.73
Interest on investment		
Other than land	3,504	62.57
Interest on land	9,418	168.18
Total other costs	16,772	299.50
Total all costs	24,489	437.30
Return above cash costs	5,957	106.38
Return above cash costs and family labor	3,772	67.36
Return to total investment	2,107	37.63
Return to land	-1,397	-24.95

Production Assumptions: Average herd 56 cows; 90 percent calf crop with pregnancy testing; 5 percent calf loss to weaning; 20 cows per bull; 25 percent of heifer calves held for replacement; 4 percent cow loss; 13 percent dependent on wildlife refuge for annual feed.

Appendix Table 10 b Costs and returns, beef cow enterprises with 100-199 head, Charles M. Russell National Wildlife Refuge

Item	Unit	Number	Average weight	Price Cwt	Total Value
Sales:					
Steer calves	Head	57	430	71.23	17,458
Heifer calves	Head	25	410	62.82	6,439
Yearling steers	Head	--	--	--	--
Yearling heifers	Head	12	680	56.02	4,571
Cull cows	Head	16	950	36.99	5,622
Total					34,090
Total/cow					254.40

	Total Value	Value/ Cow
Cash costs:		
BLM grazing fee	238	1.78
Wildlife Refuge	731	5.46
Private range lease/rent	1,130	8.43
State lease	113	.84
Hay (produce)	2,237	16.69
Hay (purchase)	--	--
Protein supplement	4,212	31.43
Irrigated pasture	--	--
Salt and mineral	355	2.65
Concentrate feeds	--	--
Veterinary and medicine	712	5.31
Hired trucking	261	1.95
Marketing	549	4.10
Fuel and lubricants	1,392	10.39
Repairs	1,450	10.82
Land taxes	1,154	8.61
Other taxes	206	1.54
Insurance	570	4.25
Interest on operating capital	896	6.69
General farm overhead	989	7.38
Other cash costs	--	--
Hired labor	588	4.39
Total cash costs	17,783	132.71
Other Costs:		
Family labor	4,307	32.14
Depreciation	3,678	27.45
Interest on investment		
Other than land	8,127	60.65
Interest on land	26,804	200.03
Total other costs	42,916	320.27
Total all costs	60,699	452.98
Return above cash costs	16,307	121.69
Return above cash costs and family labor	12,000	89.55
Return to total investment	8,322	62.10
Return to land	195	1.46

Production Assumptions: Average herd 134 cows; 90 percent calf crop with pregnancy testing; 5 percent calf loss to weaning; 20 cows per bull; 25 percent heifer calves held for replacement; 4 percent cow loss; 22 percent dependent on wildlife refuge for annual feed.

Appendix Table 10 c. Costs and returns, beef cow enterprises with 200-299 head, Charles M. Russell National Wildlife Refuge.

Item	Unit	Number	Average weight	Price Cwt	Total Value
Sales:					
Steer calves	Head	94	430	71.23	28,791
Heifer calves	Head	40	410	62.82	10,302
Yearling steers	Head	--	--	--	--
Yearling heifers	Head	19	680	56.02	7,238
Cull cows	Head	27	950	36.99	9,488
Total					55,819
Total/cow					252.57

Cash costs:	Total Value	Value/ Cow
BLM grazing fee	301	1.36
Wildlife Refuge	873	3.95
Private range lease/rent	1,459	6.60
State lease	123	.56
Hay (produce)	4,474	20.24
Hay (purchase)	2,105	9.52
Protein supplement	1,789	8.10
Irrigated pasture	--	--
Salt and mineral	597	2.70
Concentrate feeds	--	--
Veterinary and medicine	1,059	4.79
Hired trucking	298	1.35
Marketing	373	1.69
Fuel and lubricants	1,841	8.33
Repairs	2,128	9.63
Land taxes	1,843	8.34
Other taxes	298	1.35
Insurance	928	4.20
Interest on operating capital	1,410	6.38
General farm overhead	1,478	6.69
Other cash costs	--	--
Hired labor	2,060	9.32
Total cash costs	25,437	115.10
Other Costs:		
Family labor	7,585	34.32
Depreciation	2,339	10.58
Interest on investment		
Other than land	13,215	59.80
Interest on land	39,338	178.00
Total other costs	62,477	282.70
Total all costs	87,914	397.80
Return above cash costs	30,382	137.48
Return above cash costs and family labor	22,797	103.15
Return to total investment	20,458	92.57
Return to land	7,243	32.77

Production Assumptions: Average herd 221 cows; 90 percent calf crop with pregnancy testing; 5 percent calf loss to weaning; 20 cows per bull; 25 percent of heifer calves held for replacement; 4 percent cow loss; 17 percent dependent on wildlife refuge for annual feed.

Appendix Table 10 d. Costs and returns, beef cow enterprises with 300 head or more, Charles M. Russell National Wildlife Refuge.

Item	Unit	Number	Average weight	Price Cwt	Total Value
Sales:					
Steer calves	Head	400	430	71.23	122,516
Heifer calves	Head	166	410	62.82	42,755
Yearling steers	Head	--	--	--	--
Yearling heifers	Head	82	680	56.02	31,237
Cull cows	Head	115	950	36.99	40,412
Total					236,920
Total/cow					253.12

Cash costs:	Total Value	Value/ Cow
BLM grazing fee	2,982	3.19
Wildlife Refuge	2,113	2.26
Private range lease/rent	6,665	7.12
State lease	561	.60
Hay (produce)	13,980	14.94
Hay (purchase)	6,416	6.85
Protein supplement	10,080	10.77
Irrigated pasture	--	--
Salt and mineral	2,527	2.70
Concentrate feeds	--	--
Veterinary and medicine	4,483	4.79
Hired trucking	1,264	1.35
Marketing	1,582	1.69
Fuel and lubricants	6,234	6.66
Repairs	6,243	6.67
Land taxes	8,518	9.10
Other taxes	1,320	1.41
Insurance	2,902	3.10
Interest on operating capital	4,754	5.08
General farm overhead	4,399	4.70
Other cash costs	--	--
Hired labor	7,582	8.10
Total cash costs	94,605	101.07
Other Costs:		
Family labor	24,800	26.50
Depreciation	24,026	25.67
Interest on investment		
Other than land	58,961	62.99
Interest on land	184.392	197.00
Total other costs	292,179	312.16
Total all costs	386,784	413.23
Return above cash costs	142,315	152.05
Return above cash costs and family labor	117,515	125.55
Return to total investment	93,489	99.88
Return to land	34,528	36.89

Production Assumptions: Average herd 936 cows; 90 percent calf crop with pregnancy testing; 5 percent calf loss to weaning; 20 cwos per bull; 25 percent of heifer calves held for replacement; 9 percent dependent on wildlife refuge for annual feed.

Appendix Table 10e-Estimated annual reduction in selected inputs, costs, and returns, from alternative livestock forage supplies, Charles M. Russell National Wildlife Refuge

Item	Alternative Actions							
	Proposed Action		Intensive Wildlife		Multiple Use 1/		No Grazing	
	1990	2005	1990	2005	1990	2005	1990	2005
	Thousand Dollars							
Gross income	347	352	725	641	249	79	567	1,122
Cash expenditures	85	86	178	158	61	19	140	276
Return above cash costs	262	266	547	483	188	60	427	846
	Head							
Cows	1,377	1,393	2,863	2,537	983	315	2,244	4,439
	Man Years							
Family labor	5.1	5.1	10.7	9.4	3.6	1.1	8.4	16.5
Hired labor	1.4	1.4	2.8	2.5	.9	.3	2.2	4.4
	Percent							
Reduction in forage	-33	-33	-67	-60	-26	-12	-54	-100

1/ There are 7,500 unallocated AUMs with this alternative. About one-half of these may be used by present Refuge users.

Appendix Table 10f-Effect of changes in forage supplies upon total cash costs per cow, Charles M. Russell National Wildlife Refuge [1/]

Reduction in Refuge grazing (Percent)	Herd size			
	0-99	100-199	200-299	300 and over
		Dollars/cow		
No change	137.80	132.71	105.50	101.07
30	140.50	137.37	117.21	102.19
50	142.36	140.86	119.22	102.96
100	147.69	151.42	124.98	105.02

[1/] See tables 1-4 for specific items included as cash costs.

Appendix Table 10g-Distribution of producers by herd size and dependency on Refuge grazing

Dependency (percent)	0-99	100-199	200-299	300 and over	All sizes
			Percent of producers		
0 -10	17	26	42	43	36
11-20	58	21	26	38	34
21-30		32	16	8	14
31-50		16	11	11	10
51 and over	25	5	5		6
Total	100	100	100	100	100
			Percent of annual feed		
Average dependency	13	22	17	9	13

Appendix Table 10h-Impact on return above cash costs of proposed action, by herd size and dependency

Herd size (head)	Reduction in return above cash costs			
	Average producer		High dependency producers 1/	
	Dollars	Percent	Dollars	Percent
0-99	385	6	2/	2/
100-199	1,700	10	2,300	14
200-299	4,200	13	7,800	24
300 and over	4,900	3	18,500	13

1/ Indicated reductions in return above cash costs assume 31 percent dependency. Since at high dependency producers are above this percentage, their losses of return above cash costs will exceed these values.

2/ High dependency producers have less than 12 cows and should not be seriously impacted by reductions.

Appendix Table101-Impacts of incremental adjustments in forage, Charles Russell National Wildlife Refuge, 0-99 cows, average 56 head

Item	No Change	Percent Reductions						
		5	10	15	20	25	30	35
				Dollars				
Gross income	13,675	13,582	13,507	13,414	13,321	13,247	13,154	13,061
Total cash costs	7,717	7,690	7,669	7,643	7,616	7,595	7,569	7,542
Value of family labor	2,185	2,170	2,158	2,144	2,129	2,117	2,102	2,087
Depreciation	1,665	1,663	1,662	1,660	1,658	1,656	1,654	1,652
Interest on investment other than land	3,504	3,483	3,466	3,444	3,423	3,406	3,385	3,363
Return above:								
Cash costs	5,958	5,892	5,838	5,771	5,705	5,652	5,585	5,519
Cash costs and family labor	3,773	3,722	3,680	3,627	3,576	3,535	3,483	3,432
Return to total investment	2,108	2,059	2,018	1,967	1,918	1,879	1,829	1,780
Return to land	-1,396	-1,424	-1,448	-1,477	-1,505	-1,527	-1,556	-1,583
Herd size	56.00	55.62	55.32	54.94	54.56	54.25	53.87	53.49
Family Labor	583	579	576	572	568	564	561	557
Hired Labor	37	37	37	36	36	36	36	36

Appendix Table 101-(Continued)

Item	Percent Reductions				Percent Increases		
	40	45	50	100	5	10	15
				Dollars			
Gross income	12,986	12,893	12,819	11,944	13,720	13,720	13,720
Total cash costs	7,521	7,495	7,474	7,225	7,735	7,743	7,752
Value of family labor	2,075	2,060	2,048	1,909	2,192	2,193	2,193
Depreciation	1,650	1,648	1,647	1,628	1,666	1,666	1,666
Interest on investment other than land	3,346	3,325	3,308	3,107	3,514	3,515	3,515
Return above:							
Cash costs	5,465	5,398	5,345	4,719	5,985	5,977	5,968
Cash costs and family labor	3,390	3,338	3,297	2,810	3,793	3,784	3,775
Return to total investment	1,740	1,690	1,650	1,182	2,127	2,118	2,109
Return to land	-1,606	-1,635	-1,658	-1,925	-1,387	-1,397	-1,406
Herd size	53.18	52.80	52.50	48.92	56.19	56.19	56.19
Family Labor	553	549	546	509	585	585	585
Hired Labor	35	35	35	32	37	37	37

Appendix Table10 j-Impacts of incremental adjustments in forage, Charles Russell National Wildlife Refuge, 100-199 cows, average 134 head

Item	No Change	Percent Reductions						
		5	10	15	20	25	30	35
				Dollars				
Gross income	34,093	33,719	33,326	32,953	32,580	32,187	31,813	31,440
Total cash costs	17,783	17,684	17,580	17,481	17,382	17,277	17,178	17,079
Value of family labor	4,307	4,260	4,210	4,163	4,116	4,066	4,019	3,972
Depreciation	3,678	3,670	3,662	3,654	3,646	3,638	3,630	3,623
Interest on investment other than land	8,127	8,045	7,959	7,876	7,794	7,708	7,626	7,543
Return above:								
Cash costs	16,310	16,035	15,746	15,472	15,198	14,910	14,635	14,361
Cash costs and family labor	12,003	11,775	11,536	11,309	11,082	10,844	10,616	10,389
Return to total investment	8,325	8,105	7,874	7,655	7,436	7,206	6,986	6,766
Return to land	198	60	-85	-221	-358	-502	-640	-777
Herd size	134.01	132.54	130.99	129.53	128.06	126.51	125.05	123.58
Family Labor	1,148	1,136	1,123	1,110	1,097	1,084	1,072	1,059
Hired Labor	157	155	153	152	150	148	146	145

Appendix Table 10j--(Continued)

Item	Percent Reductions				Percent Increases		
	40	45	50	100	5	10	15
			Dollars				
Gross income	31,047	30,674	30,301	26,489	34,466	34,859	35,232
Total cash costs	16,975	16,876	16,777	15,766	17,882	17,986	18,085
Value of family labor	3,922	3,875	3,828	3,346	4,354	4,404	4,451
Depreciation	3,615	3,607	3,599	3,520	3,686	3,694	3,702
Interest on investment other than land	7,457	7,375	7,293	6,454	8,210	8,296	8,378
Return above:							
Cash costs	14,072	13,798	13,524	10,723	16,584	16,873	17,147
Cash costs and family labor	10,150	9,923	9,696	7,377	12,230	12,469	12,696
Return to total investment	6,535	6,316	6,097	3,857	8,544	8,775	8,994
Return to land	-922	-1,059	-1,196	-2,597	334	479	616
Herd size	122.04	120.57	119.10	104.12	135.47	137.02	138.49
Family Labor	1,046	1,033	1,021	892	1,161	1,174	1,186
Hired Labor	143	141	139	122	159	160	162

Appendix Table 10k - Impacts of incremental adjustments in forage, Charles Russell National Wildlife Refuge, 200-299 cows, average 221 head

Item	No Change	Percent Reductions 5	10	15	20	25	30	35
				Dollars				
Gross income	55,873	55,393	54,913	54,434	53,954	53,474	52,973	52,494
Total cash costs	23,316	25,194	25,073	24,952	24,830	24,709	24,582	24,461
Value of family labor	7,585	7,520	7,455	7,390	7,325	7,260	7,192	7,127
Depreciation	2,339	2,329	2,319	2,309	2,299	2,289	2,278	2,268
Interest on investment other than land	13,215	13,108	13,002	12,896	12,789	12,683	12,572	12,466
Return above:								
Cash costs	32,557	30,199	29,840	29,482	29,124	28,765	28,391	28,033
Cash costs and family labor	24,972	22,679	22,385	22,092	21,799	21,505	21,199	20,906
Return to total investment	22,633	20,350	20,066	19,783	19,500	19,216	18,921	18,638
Return to land	9,418	7,242	7,064	6,887	6,711	6,533	6,349	6,172
Herd size	221.21	219.31	217.41	215.51	213.61	211.71	209.73	207.83
Family Labor	2,023	2,005	1,988	1,971	1,953	1,936	1,918	1,900
Hired Labor	550	545	540	536	531	526	521	516

Appendix Table 10k - (Continued)

Item	Percent Reductions				Percent Increases		
	40	45	50	100	5	10	15
			Dollars				
Gross income	52,014	51,534	51,054	46,235	56,353	56,833	57,312
Total cash costs	24,339	24,218	24,097	22,877	25,437	25,559	25,680
Value of family labor	7,061	6,996	6,931	6,277	7,650	7,716	7,781
Depreciation	2,258	2,248	2,238	2,137	2,349	2,359	2,369
Interest on investment other than land	12,359	12,253	12,146	11,078	13,321	13,428	13,534
Return above:							
Cash costs	27,675	27,316	26,957	23,358	30,916	31,274	31,632
Cash costs and family labor	20,614	20,320	20,026	17,081	23,266	23,558	23,851
Return to total investment	18,356	18,072	17,788	14,944	20,917	21,199	21,482
Return to land	5,997	5,819	5,642	3,866	7,596	7,771	7,948
Herd size	205.93	204.03	202.13	183.05	223.11	225.01	226.91
Family Labor	1,883	1,866	1,848	1,674	2,040	2,057	2,075
Hired Labor	512	507	502	455	554	559	564

Appendix Table 10 1-Impacts of incremental adjustments in forage, Charles Russell National Wildlife Refuge, 300 or more cows, average 936 head

Item	No Change	Percent Reductions						
		5	10	15	20	25	30	35
				Dollars				
Gross income	236,381	235,335	234,289	233,242	232,196	231,168	230,122	229,076
Total cash costs	94,605	94,354	94,103	93,852	93,602	93,355	93,104	92,853
Value of family labor	24,801	24,691	24,581	24,471	24,362	24,254	24,144	24,034
Depreciation	24,026	24,004	23,982	23,960	23,938	23,917	23,895	23,873
Interest on investment other than land	58,961	58,729	58,497	58,265	58,033	57,805	57,573	57,341
Return above:								
Cash costs	141,776	140,981	140,186	139,390	138,594	137,813	137,018	136,223
Cash costs and family labor	116,975	116,290	115,605	114,919	114,232	113,559	112,874	112,189
Return to total investment	92,949	92,286	91,623	90,959	90,294	89,642	88,979	88,316
Return to land	33,988	33,557	33,126	32,694	32,261	31,837	31,406	30,975
Herd size	935.87	931.73	927.59	923.45	919.30	915.23	911.09	906.95
Family Labor	6,617	6,587	6,558	6,529	6,499	6,471	6,441	6,412
Hired Labor	2,021	2,013	2,004	1,995	1,986	1,977	1,968	1,959

Appendix Table 101-(Continued)

Item	Percent Reductions				Percent Increases		
	40	45	50	100	5	10	15
				Dollars			
Gross income	228,030	226,983	225,937	215,492	237,428	238,474	239,520
Total cash costs	92,603	92,352	92,101	89,597	94,856	95,107	95,357
Value of family labor	23,924	23,815	23,705	22,609	24,910	25,020	25,130
Depreciation	23,851	23,829	23,807	23,588	24,048	24,070	24,092
Interest on investment other than land	57,109	56,877	56,645	54,330	59,193	59,425	59,657
Return above:							
Cash costs	135,427	134,631	133,836	125,895	142,572	143,367	144,163
Cash costs and family labor	111,503	110,816	110,131	103,286	117,662	118,347	119,033
Return to total investment	87,652	86,987	86,324	79,698	93,614	94,277	94,941
Return to land	30,543	30,110	29,679	25,368	34,421	34,852	35,284
Herd size	902.81	898.66	894.52	853.17	940.02	944.16	948.30
Family Labor	6,383	6,354	6,324	6,032	6,646	6,675	6,704
Hired Labor	1,950	1,941	1,932	1,843	2,030	2,039	2,048

Appendix 11. Income in the six-county region at Charles M. Russell National Wildlife Refuge, Montana, 1970 and 1975 ($000's).[1/][2/]

Source of labor	Fergus		Garfield		McCone		Petroleum		Phillips		Valley		Total	
	1970	1975	1970	1975	1970	1975	1970	1975	1970	1975	1970	1975	1970	1975
Labor and proprietors income	30,730	49,425	5934	9751	7951	18,418	2308	1060	16,707	24,433	38,064	63,835	101,694	166,922
Wages and salary disbursements	17,805	27,070	1814	2737	3348	6461	716	812	5529	9378	21,140	35,075	50,152	81,533
Other labor income	843	1609	90	93	200	449	20	23	269	556	1390	1943	2812	4673
Proprietors income	12,082	20,746	4030	6921	4403	11,508	1572	225	10,909	14,499	15,534	26,817	48,530	80,716
farm	8626	15,216	3742	6297	3608	10,135	1442	-133	9611	14,338	11,800	20,932	38,829	64,785
nonfarm	3456	5530	288	624	795	1373	130	358	1298	2161	3734	5885	9701	15,931
By industry														
farm	9638	16,722	4277	7093	4319	11,196	1650	178	10,376	13,478	12,699	22,267	42,959	70,934
nonfarm	21,092	32,703	1657	2658	3632	7222	658	882	6331	10,955	25,365	41,568	58,735	95,988
private	15,413	24,190	867	1388	2759	5737	350	492	4243	7274	18,619	31,361	42,251	70,442
manufacturing	1060	2285	(D)	(D)	(D)	(D)	(D)	(L)	170	529	5032	(D)	(D)	(D)
mining	(D)	(D)	(D)	(D)	(L)	(D)	(L)	(D)	(D)	(D)	(D)	(D)	(D)	(D)
contract construction	2308	5397	(D)	114	258	834	(D)	61	254	395	2306	6096	(D)	12,897
wholesale and retail trade	5008	6992	416	680	915	1701	100	199	1690	2854	4671	7973	12,800	20,399
finance, insurance and real estate	1012	1389	(D)	117	(D)	(D)	(L)	(L)	185	378	1003	1314	(D)	(D)
transportation, communications and public utilities	1709	2324	(L)	(D)	(D)	1896	0	0	793	1279	2581	4277	(D)	(D)
services	3767	4957	112	262	350	790	(D)	57	971	1529	2762	9914	(D)	17,509
other industries	(D)	(D)	(L)	50	(D)	(D)	(L)	(D)	(D)	(D)	(D)	(D)	(D)	(D)
government	5679	8513	790	1270	873	1485	308	390	2088	3681	6746	10,207	16,404	25,546
federal, civilian	1639	2140	97	118	134	206	58	49	716	1241	2497	3595	5141	7349
federal, military	902	903	25	35	40	59	48	46	76	118	1302	1277	2391	2438
state and local	3138	5470	668	1117	699	1220	202	295	1296	2322	2947	5355	8950	15,759
Personal income by place of residence[3/]	43,758	70,931	7182	12,110	9698	21,853	2532	1682	21,454	33,336	46,070	78,072	130,694	217,984
Per capita income	3,452	5,515	3,977	7,738	3,358	8,142	3,729	2,552	3,963	6,112	3,995	5,867	3,838	5,981

[1/] Current income from all sources measured after deduction of personal contributions to Social Security, government retirement and other social insurance programs but before deduction of income and other personal taxes.

[2/] Source: Montana Department of Community Affairs (1978).

[3/] Source: U.S. Department of Commerce (1970, 1975).

(D)-Not shown to avoid disclosure of confidential information, data included in totals. (L)-Less than $50,000, data included in totals.

Appendix 12. Number of persons 14 years or older employed in the six-county region of Charles M. Russell National Wildlife Refuge, Montana, 1960 and 1970.[1]

Employment category	Fergus 1960	Fergus 1970	Garfield 1960	Garfield 1970	McCone 1960	McCone 1970	Petroleum 1960	Petroleum 1970	Phillips 1960	Phillips 1970	Valley 1960	Valley 1970	Total 1960	Total 1970
Industry														
agriculture, forestry, fisheries	1466	1099	490	341	631	478	222	155	924	702	963	903	4696	3678
mining, construction	443	211	35	70	110	20	15	17	132	83	918	243	1653	644
manufacturing	239	229	8	18	49	6	14	0	41	32	114	462	465	747
transportation, communication, other utilities	234	215	15	18	26	50	7	7	171	58	410	316	863	66
wholesale, retail trade	981	1098	60	80	97	221	33	8	316	414	1021	703	2508	25
finance, insurance, real estate	160	184	7	14	9	24	0	0	46	51	141	108	363	
business, repair services	108	66	19	26	18	16	5	0	65	23	48	56	263	187
personal services	236	192	30	15	39	28	23	10	125	87	317	170	770	502
entertainment, recreation services	17	41	4	0	4	8	0	0	8	9	40	24	73	82
professional, related services	659	648	69	88	131	106	34	25	209	281	533	697	1635	1845
public administration	244	283	45	34	50	46	14	39	91	97	380	257	824	756
industry not reported	151	115	0	14	3	47	0	0	150	142	86	184	390	502
Occupation														
professional, technical, kindred	577	529	45	79	110	87	28	19	162	254	481	510	1403	1478
managers, administrators	444	519	41	56	74	83	15	25	170	163	531	388	1275	1234
sales workers	309	363	14	15	21	51	14	0	103	110	292	197	753	736
clerical, kindred	373	438	42	49	55	84	8	27	224	121	515	451	1217	1170
craftsmen, foremen, kindred	528	402	33	43	87	82	27	17	150	195	812	391	1646	1130
operative, kindred	330	274	36	55	77	50	8	0	136	97	473	404	1060	880
laborers (nonfarm)	195	124	3	19	23	4	4	3	71	19	284	180	580	349
farmers, farm managers	1065	748	348	204	551	391	147	88	596	475	758	648	3465	2554
farm laborers, foremen	333	303	142	121	75	78	75	67	307	203	137	245	1069	1017
service workers (nonhousehold)	468	531	70	40	83	81	20	11	175	183	426	510	1242	1356
private household workers	81	40	8	10	4	7	16	4	34	17	150	19	293	97
occupation not reported	235	110	0	27	7	52	5	0	150	142	103	180	500	511
Total employment[2]	4938	4381	782	718	1167	1050	367	261	2278	1979	4971	4123	14,503	12,512

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[1] Montana Department of Community Affairs (1978).

[2] Totals are the same for industry and occupation groups.

Appendix 13. Estimation of indirect economic impacts.

Introduction

An interindustry model is used to identify the inter-dependent structure of the local economy surrounding the Charles M. Russell National Wildlife Refuge. The interindustry model, commonly called an input-output model, is used to measure the structural interdependence among producing sectors within the region. The input-output technique shows what changes in one sector (livestock) will have on activities in the other sectors.

The model is governed by what are termed final demands. Changes in the production by basic industries which export goods and services to customers from outside the study region determine the level of economic activity within the region. Thus, changes in the export of livestock and changes in the sale of goods and services to tourists constitute changes in final demand. The primary purpose of the input-output technique is to trace the direct and indirect impacts of such changes in final demand throughout the local economy. A more detailed description of the input-output technique can be found in Richardson 1972.

Procedures Followed

The input-output method of analysis results in the calculation of "multipliers" which can be applied to projected changes in exports by a given industry in order to calculate the direct plus indirect economic impacts on a regional economy. Total sales, personal income, and employment are among the set of important impacts which may be calculated through the use of input-output multipliers.

Two major direct effects are foreseen as a result of the proposed alternative. One direct impact is on the level of livestock production in the study region. This economic impact has been reviewed through the use of linear programming analysis and is reported elsewhere in this report. The second direct impact is in the level of tourist activity in the study region. The changes in tourist visitation predicted in the Draft EIS are retained, but new estimates of purchases in the study region by tourists are used to calculate changes in sales to tourists.

Once the direct changes in business activity in the livestock and tourist industries have been estimated, input-output multipliers are used to find the total (direct plus indirect) impacts on the local economy.

READEX FICHE

Selection of Appropriate Multipliers

The construction of an input-output model is a time-consuming and expensive process. Neither time nor available finances would allow development of a model specific to the study region. No models presently exist specifically of the study region, although some models are under development which might be used in the future.1/ Multipliers for the livestock sector and for sectors most affected by tourist spending have been taken from a recent study conducted in Colorado near Kremmling. The Kremmling study is for a relatively isolated and small regional economy in Colorado. It is the most recent survey-based input-output model available to the researchers for this report. Since it was developed by researchers, it has the added advantage of familiarity with the details of its construction. Appendix Table 13a presents a distribution of employment by industry in the CMR study region and the Kremmling for comparison. It may be noted that the absolute size of the local economy in the Kremmling model is smaller than in the CMR study region. Generally, the estimated indirect impacts will increase as the size and self-sufficiency of the region is increased. Thus, the multipliers taken from the Kremmling study may slightly understate the total impacts on the CMR study region. Such a generalization may not always apply, however, since some industries may benefit from the lack of competing suppliers due to the geographic isolation of a region. Alternative livestock industry input-output multipliers can be found in Bartlett, Taylor, and McKean.2/

A unique sector is seldom available for the tourist industry. This does not present a significant problem, however, since a weighted multiplier is easily calculated. The recent survey of tourists in Wyoming (1979), identified ten sectors or industry groups selling to tourists.3/ The large Kremmling study are aggregated using spending shares from the Wyoming tourist survey. These calculations are presented in Appendix Table 13b. A weighted business multiplier and weighted employeemnt multiplier are calculated for tourist spending.

1/ The Forest Service I-O model based upon secondary data as used in the previous Draft EIS is not currently available. An economic base model is currently under construction, but is unavailable at this time.

2/ Taken from: Impacts of Federal Grazing on the Economy of Colorado, by E.T. Bartlett, R.G. Taylor, and John McKean, Contract Report, U.S. Forest Service, Bureau of Land Management and Colorado State Experiment Station.

3/ The Wyoming Travel/Tourism Industry, Industrial Development Division, Department of Economic Planning and Development, July 1980.

It should be noted that a Type II multiplier was used to estimate the total impacts of changes in livestock production, while a Type I multiplier was used in conjunction with the tourist spending estimates. A Type II multiplier for livestock is appropriate given that virtually all livestock production is exported from the study region, and maximum expected impact measurement is desired. To the extent that households do not respend a fixed proportion of their incomes inside the study region, the Type II multiplier could overstate the total impact.

A Type I multiplier was used for the tourist impact measurement because it was not possible to identify tourist exports. Rather, total spending by households, both local and export, was multiplied by the Type I multiplier. Because of a lack of export data, it was necessary to assume that households are exogenous when estimating tourism impacts. With this assumption, total household spending rather than only export spending could be utilized in the impact measurement. A smaller multiplier was thus applied to the large tourist spending estimates. Appendix Tables 13c-e show total or direct plus indirect effects of the management alternatives on sales and employment.

Summary of Findings

Total regional impacts of change in livestock production caused by the management alternatives are shown in Appendix Table 13c. Total impacts of change in tourism caused by the management alternatives are shown in Appendix Table 13d. Appendix Table 13e shows the combined impacts from changes in livestock production and tourism for each of the management alternatives.

Appendix Table 13a.
Distribution of Employment by Sector, Kremmling Region, C.M. Russell Region

Sector Description	SIC Codes	Kremmling Employment[1]	C.M. Russell Employment[2]
Ag/Livestock	01, 02, 07	81	29-73
Mining	12, 13	111	19-52
Construction	14-17	215	308-326
Manufacturing	20-39	267	389-425
Transport, Comm., Public Utilities	40-49	125	318-415
Wholesale	50, 51	809	575-654
Retail	52-59		1741
Finance, Insurance, Real Estate	60-69	152	372-469
Services	70-89 exclu. 82	925	1,629-1,647
Totals		2,685[4]	5,552[4]

[1] Source: An Input-Output Model of the Kremmling Region of Western Colorado, Contract Report, Bureau of Land Management, Economic Department, Colorado State University, Fort Collins, Colorado, John R. McKean and Joseph Wever, 1980.

[2] Federal disclosure law requires presentation of ranges rather than actual employment numbers in certain counties with small numbers of firms.

[3] Source: County Business Patterns--MONTANA, Table 2. Counties--Employees, Payroll, and Establishments, by Industry, 1977.

[4] Excludes employment in educational services and government.

Appendix Table13b

Estimation of Weighted Average Multipliers for Tourist Spending for All Recreation Activities

Industry	Spending Per Person[1]	Percent	Business Mult.[2,3]	Employment Mult.[2]
Lodging Places	$5.18	16.88	2.58	.865 x 10^{-4}
Eating & Drinking Places	5.15	16.79	1.73	.562 x 10^{-4}
Auto Service	0.97	3.16	1.52	.167 x 10^{-4}
Gasoline	5.75	18.74	1.52	.167 x 10^{-4}
Food Stores	3.19	10.40	1.42	.160 x 10^{-4}
Apparel Stores	3.02	9.84	1.42	.160 x 10^{-4}
Dept. & Variety	1.08	3.52	1.42	.160 x 10^{-4}
Amusement Places	3.25	10.59	1.90	.352 x 10^{-4}
Drugs, Liquor & Sporting Goods	1.82	5.93	1.42	.160 x 10^{-4}
Miscellaneous[4]	1.27	4.15	2.14	.522 x 10^{-4}
TOTAL	30.68	100.00	1.77 Weighted Business Multiplier	.383 x 10^{-4} Weighted Employment Multiplier

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[1] Source: The Wyoming Travel/Tourism Industry, Industrial Development Division, Department of Economic Planning and Development, July 1980.

[2] Source: An input-Output Model of the Kremmling Region of Western Colorado, Contract Report, Bureau of Land Management, Economics Department, Colorado State University, Fort Collins, Colorado, John R. McKean and Joseph Weber,1980.

[3] A Type I business and employment multiplier is used because the portion of tourist visits from outside the study region is unknown. A Type I multiplier includes households in the exogenous part of the input-output model. The Type I multiplier is smaller than the Type II multiplier but it is the appropriate measure when exports to tourists cannot be seperated from local consumer spending. In effect, a smaller mutliplier is being applied to a larger change in spending than would be the case with a Type II multiplier on exports.

[4] Assumed to be other services.

Appendix
Table 13c Direct Plus Indirect Impacts of Change in Livestock Production on Sales and Employment.

Management Alternatives		Change in Sales from Current Use to Alternative Actions[1]	Input-Output Business Multiplier[2]	Direct Plus Indirect Change in Local Sales	Input-Output Employment Multiplier[2]	Direct plus Indirect Change in Local Employment
Proposed Action	1985	$ -347,000	2.67	$ -926,490	$.379 \times 10^{-4}$	-13
	2000	-352,000	2.67	-939,840	$.379 \times 10^{-4}$	-13
Intensive Wildlife Management	1985	-725,000	2.67	-1,935,750	$.379 \times 10^{-4}$	-27
	2000	-641,000	2.67	-1,711,470	$.379 \times 10^{-4}$	-24
Multiple Use	1985	-249,000	2.67	-664,830	$.379 \times 10^{-4}$	- 9
	2000	- 79,000	2.67	-210,930	$.379 \times 10^{-4}$	- 3
No Grazing	1985	-567,000	2.67	-1,513,890	$.379 \times 10^{-4}$	-21
	2000	-1,122,000	2.67	-2,995,740	$.379 \times 10^{-4}$	-43

[1] Source: Linear Programming Analysis conducted in this study.

[2] A Type II multiplier which includes households (labor) as part of the interdenendent local economy is applies to changes in livestock industry sales. The assumption that households respend part of their incomes in the local economy and that all of livestock output is exported out of the six county study region provides an upper bound on local impacts.

Appendix
Table 13dDirect Plus Indirect Impacts of Change in Tourist Visits on Sales and Employment.

Management Alternatives		Change in Sales from Current Use to Alternative Actions [1]	Input-Output Weighted Bysiness Multiplier[2]	Direct Plus Indirect Change in Local Sales	Input-Output Weighted Employment Multiplier[2]	Direct Plus Indirect Change in Local Employment
Proposed Action	1985	$ +92,040	1.77	$ +162,911	$.383 \times 10^{-4}$	+ 4
	2000	+276,120	1.77	+488,520	$.383 \times 10^{-4}$	+11
Intensive Wildlife Management	1985	-92,040	1.77	-162,911	$.383 \times 10^{-4}$	- 4
	2000	-613,600	1.77	-1,086,072	$.383 \times 10^{-4}$	-24
Multiple Use	1985	+368,160	1.77	+651,643	$.383 \times 10^{-4}$	+14
	2000	+1,043,120	1.77	+1,846,322	$.383 \times 10^{-4}$	+40
No Grazing	1985	+153,400	1.77	+271,518	$.383 \times 10^{-4}$	+ 6
	2000	+337,480	1.77	+597,340	$.383 \times 10^{-4}$	+13

[1] Source: Visitor days presented in Appendix Table 17-A in C.M. Russell National Wildlife Refuge Draft E.I.S. Table 17-A, Appendix. Estimated by subtracting visitor days for "no action" from visitor days for the various management alternatives and multiplying the differences by $30.68. The latter figure is the estimate of daily per person expenditures reported earlier from the Wyoming tourism study.

[2] Source: Weighted average of multiples for goods purchased by tourists. See text and Table 3.

Appendix Table 13e Total Impacts of Change in Livestock Production and Tourism.

Management Alternatives		Total Change in Sales	Total Change in Employment
Proposed Action	1985	$ -763,579	- 9
	2000	-451,320	- 2
Intensive Wildlife Management	1985	-2,098,661	-31
	2000	-2,797,542	-48
Multiple Use	1985	+13,187	+ 5
	2000	+1,635,392	+37
No Grazing	1985	-1,242,372	-15
	2000	-2,398,400	-30

Source: Calculated from data shown on Tables 3 and 4.

Appendix 14. Summary comparison of important wildlife habitat conditions for the present situation and five management alternatives on the Charles M. Russell National Wildlife Refuge, Montana.1/

	Present situation	No Action		Proposed Action		Intensive Wild-life Management		Multiple Use		No Grazing	
	1978	1985	2000	1985	2000	1985	2000	1985	2000	1985	2000
Sharp-tailed grouse											
overall value*	4.6	4.6	4.7	5.8	7.2	6.8	8.0	4.8	5.3	6.8	8.6
residual cover	4.4	4.4	4.5	5.5	7.0	6.7	8.4	4.6	5.1	6.8	8.8
shrub crown cover	4.6	4.6	4.6	5.7	7.1	6.7	8.2	4.8	5.3	6.4	8.2
quality of shrubs	5.4	5.4	5.5	6.3	7.3	6.5	8.0	5.7	6.2	6.9	8.9
understory quality	6.4	6.4	6.4	6.8	7.4	6.9	7.6	6.7	7.4	7.1	8.1
Mule deer											
overall value	5.0	5.6	5.8	6.8	7.2	7.3	8.0	5.9	6.5	7.0	7.5
quantity winter browse	4.9	4.9	4.9	6.1	7.1	7.1	8.6	5.1	5.6	6.6	7.7
quality winter browse	5.9	5.9	5.9	7.4	7.6	7.7	8.5	6.2	6.8	7.5	8.0
forb quality	5.5	5.5	5.7	6.9	7.4	7.5	7.9	5.7	6.3	6.9	8.1
deciduous shrub	5.2	5.2	5.4	6.5	7.2	7.1	7.6	5.4	6.0	6.8	6.9
topography	6.2	6.2	6.3	6.2	6.2	6.2	6.2	6.2	6.2	6.2	6.2
Pronghorns											
overall value	5.1	5.2	5.3	6.5	7.4	6.6	7.1	6.0	6.6	5.9	6.3
mixture shrub & grass	4.7	4.7	4.8	5.9	7.1	6.3	7.0	5.2	5.7	5.0	5.6
forb quality	5.6	5.6	5.6	7.0	7.4	7.0	7.3	6.3	6.9	6.0	6.6
silver sage	4.8	4.8	4.8	6.0	6.8	5.9	6.6	5.8	6.4	5.5	6.2
big sage-quantity	5.2	5.2	5.2	6.5	7.0	6.2	6.8	5.5	6.1	5.5	6.0
big sage-height	7.6	7.6	7.6	7.6	7.7	7.5	7.7	6.2	6.3	6.1	6.0
topography	7.3	7.3	7.3	7.3	7.3	7.3	7.3	7.3	7.3	7.3	7.3
White-tailed deer											
overall value	5.4	5.4	5.6	6.5	7.4	7.0	8.1	5.7	6.9	6.8	7.9
overstory density	7.0	7.0	7.0	7.0	7.0	7.0	7.2	7.0	7.0	7.0	7.0
understory density	5.4	5.4	5.5	6.5	7.0	7.3	7.8	6.2	6.6	7.0	8.0
browse availability	4.6	4.6	4.8	5.6	7.4	6.2	7.6	5.4	7.0	6.0	7.4
openings	7.1	7.1	7.1	6.7	7.4	7.1	7.3	6.9	7.4	7.1	7.4
Elk											
overall value	6.0	6.0	6.2	7.0	7.6	7.5	8.0	6.1	6.4	7.0	7.8
coulee availability	6.5	6.5	6.5	6.5	6.5	6.5	6.5	6.5	6.5	6.5	6.5
juniper cover	6.7	6.7	6.7	6.8	7.4	7.0	8.0	6.7	6.7	6.8	7.4
topography	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8	7.8
feeding sites	5.5	5.5	5.8	6.6	7.2	6.9	7.4	6.0	6.2	7.0	7.7
water availability	8.4	8.4	8.4	8.4	8.5	8.6	8.6	9.2	9.3	8.4	8.4
Waterfowl											
overall value	3.4	3.4	3.4	4.2	7.0	7.0	9.0	4.5	7.5	6.0	8.3
pond size	3.9	3.9	3.9	4.0	4.2	6.9	7.8	6.9	7.8	4.0	4.2
submergent aquatics	3.2	3.2	3.2	4.6	6.0	6.7	8.0	4.6	6.0	4.6	6.3
emergents	3.0	3.0	3.0	3.8	7.0	7.0	9.0	3.7	6.9	6.0	8.0
upland vegetation	3.8	3.8	3.8	4.4	7.0	7.1	9.2	4.2	6.7	6.9	8.0
goose nesting sites	3.9	3.8	3.8	4.0	6.9	6.0	7.6	4.5	6.0	4.0	6.9

Appendix 14. (Cont'd.)

Endangered species introductions											
peregrine falcons	migrant only	no	no	yes	yes	yes	yes	yes	yes	yes	yes
black-footed ferrets	no	no	no	?	yes	?	yes	?	yes	?	yes
bald eagles	migrant only	migrant only		migrant	?	?	yes	migrant only		migrant only	
Unique species introductions or occurrence											
prairie dogs (probable acres occupied)	6000	6000	6600	7500	10,000	6000	7000	8500	15,000	6000	5000
swift fox	no	no	no	no	yes	yes	yes	no	yes	no	yes
burrowing owls	yes	yes	yes	yes	yes	yes	yes	yes	yes	yes	yes
mountain plovers	yes	yes	yes	yes	yes	yes	yes	yes	yes	yes	yes
ferruginous hawks	yes	yes	yes	yes	yes	yes	yes	yes	yes	yes	yes
prairie falcons	yes	yes	yes	yes	yes	yes	yes	yes	yes	yes	yes
Proposed introduction sites for bighorn sheep		Two Calf Creek		Two Calf Creek, Mickey-Brandon Buttes		Two Calf Creek, Mickey-Brandon Buttes, Larb Hills, Billy Creek, Seven-Blackfoot Creek, Wolf Coulee, Widow Coulee		Mickey-Brandon Buttes, Wolf Coulee		Two Calf Creek, Mickey-Brandon Buttes, Larb Hills	

1/ 0.0-2.5 = poor, 2.6-5.0 = fair, 5.7-7.5 = good and 7.6-10.0 = excellent.
*Biological judgment and not a numerical average. See Appendix 2 for explanation.

Appendix 15. Methodology employed in calculation of AUMs on Charles M. Russell National Wildlife Refuge.

Summary

Forage on the refuge consisted of four major steps.

Step I

A standard SCS Range Site and Condition Survey was completed on the refuge (Appendix 8). This survey gave the beginning AUM recommendation.

Step II

Mackie's work (1970) provided the basis for this step. Using a slope/water matrix developed from livestock observations, availability coefficients were computed and applied to AUM recommendations derived from SCS stocking guides in Step I. This provided for proper use of vegetation by livestock distribution over the whole area. Reduction of AUMs in this step comprised the largest percentage of the overall reduction.

Step III

Erosion potential on certain soil types eliminated AUM recommendations on those sites. These reductions were in addition to those in Step II.

Step IV

Evaluation of AUMs available after Step II in relation to various wildlife objectives was the final step of the forage allocation process. Small reductions, based on Habitat Evaluation Procedures (Appendix 2), were made to ensure forage for big game or residual cover for other wildlife species on a site specific basis.

The following is a hypothetical example of Step I through Step IV on a single refuge section.

	Section Six	AUMs Available to Livestock	
Step I	Range Site and Condition Survey		
	Range Site A, excellent condition	50	
	Range Site B, good condition	30	
	Range Site C, fair condition	20	
	subtotal	100	total 100

Step II	Slope/water matrix				
	Range Site A		-20		
	Range Site B		-15		
	Range Site C		-15		
		subtotal	-50	total	50
Step III	Erosion hazards				
	Range Site A		-0		
	Range Site B		-7		
	Range Site C		-0		
		subtotal	-7	total	43
Step IV	Wildlife objectives				
	Range Site A		-5		
	Range Site B		-0		
	Range Site C		-0		
		subtotal	-5	total	38

AUMs available to livestock on section six total 38.

Detailed Analysis

The AUMs derived from the standard SCS range site and condition survey (Appendix 8) were considered as a beginning level and the first step in allocation of forage on the refuge.

Mackie's work (1970) on mule deer, elk, and cattle interrelationships provided much of the basis for allocating forage to wildlife and livestock on the refuge. The study took place on lands included within or bordering the refuge on its southwest boundary during 1960-64. Observations of elk, deer, and cattle were made during all four seasons throughout the study period by activity such as feeding, bedding, or loafing, standing alert or traveling, occurrence on various habitat types, slopes, exposures, distances from water, and locations when first seen. A total of 11,581 observation of mule deer, 3,489 elk and 25,107 of cattle were recorded during the study. Additionally, a similar study was made by Knowles (1975) on the north side of the Missouri River in the Nichols Coulee area and provides additional supportive information.

Information obtained by Mackie and Knowles was used to determine primary use areas for livestock and develop slope and water criteria. These criteria were used to make adjustments to the interim AUM level derived from the recommended stocking rates provided in SCS stocking guides. The ojective in making slope and water adjustments was to provide a basis for stocking key livestock areas at a proper rate. This would mean that more inaccessible areas which are seldom grazed by livestock would not be allocated on an across-the-board stocking rate basis in accordance with the grazing guides. Such a situation appears to have prevailed during the 1952-53 range survey, which set stocking rates maintained to the present time.

Primary livestock areas according to Mackie would include extensive, unbroken ridgetops and broad coulee bottoms within a mile of dependable water. Primary mule deer areas included moderate to steep slopes in the ponderosa pine-juniper habitat type and the big sage-bluebunch wheatgrass habitat type on smaller ridgetops and along margins of more extensive ridges. Small to moderately extensive ridgetops dominated by the latter type in areas of light cattle use were apparent primary range areas for elk. Unlike cattle, Mackie felt that deer and elk were somewhat slope and water independent and that essentially all the wildlife refuge was available for their use. R. Ross (personal communication) indicated that large coulee bottoms and extensive ridgetops were primary livestock areas with the rougher, broken country better suited for wildlife.

Mackie's work provided that, "Management programs, numbers, and management of livestock should be considered on the basis of forage available on primary range areas rather than on types or the entire area." In recognition of this statement, a slope-water matrix for livestock was developed using Mackie's criteria as the basis for allocating forage to livestock. Livestock would be allocated forage based upon recorded on-site observations of use and distribution. This would result in a proper stocking rate for the primary areas where cattle tend to congregate. A maximum livestock stocking rate was therefore determined using the slope-water criteria provided in Mackie's study. CMR was created for the primary benefit of wildlife with excess forage to be allocated to livestock. All AUMs within a section recommended by the SCS stocking guides may be made available for wildlife if key or critical habitat is present to justify such an allocation. Conversely, all the AUMs may be allocated to livestock if there are no wildlife needs.

The slope-water matrix is provided in Appendix Table 15a. Slope and water criteria are based upon actual observations of livestock during Mackie's study. The basis for the availability coefficient was determined with J. Nelson (personal communication). Nelson verified that the slope-water matrix was a reasonable model from which to derive information. Mackie reported that 82 percent of his total livestock observations were on slopes of 0-10 degrees, 13 percent 11-25 degrees, 4 percent 25-35 degrees, and trace amounts over 35 degrees. His breakdowns by distance from water were:

Appendix 15. (Cont'd.)

Appendix Table 15a. Slope-water matrix for livestock on the Charles M. Russell National Wildlife Refuge, Montana.

Degree of slope	Slope coefficient	Distance to water (miles)	Water coefficient	Availability coefficient
0 - 10	1.0	0 - ¼	1.0	1.0
11 - 25	0.18	0 - ¼	1.0	0.18
26 - 35	0.05	0 - ¼	1.0	0.05
35 +	0.01	0 - ¼	1.0	0.01
0 - 10	1.0	¼ - ½	0.63	0.63
11 - 25	0.18	¼ - ½	0.63	0.11
26 - 35	0.05	¼ - ½	0.63	0.03
35 +	0.01	¼ - ½	0.63	0.01
0 - 10	1.0	½ - 3/4	0.41	0.41
11 - 25	0.18	½ - 3/4	0.41	0.07
26 - 35	0.05	½ - 3/4	0.41	0.02
35 +	0.01	½ - 3/4	0.41	unsuitable
0 - 10	1.0	3/4 - 1	0.21	0.21
11 - 25	0.18	3/4 - 1	0.21	0.04
26 - 35	0.05	3/4 - 1	0.21	0.01
35 +	0.01	3/4 - 1	0.21	unsuitable
0 - 10	1.0	1 - 2	0.10	0.10
11 - 25	0.18	1 - 2	0.10	0.02
26 - 35	0.05	1 - 2	0.10	unsuitable
35 +	0.01	1 - 2	0.10	unsuitable

Distance in Miles	Percent observations
0-1/4	37
1/4-1/2	22
1/2-3/4	20
3/4-1	11
1-2	10

A total of 90 percent of all observations of livestock was within one mile or less of water.

Availability coefficients were then determined by slope and water observation percentages for each slope category and distance factor for livestock. For example, slopes of 0-10 degrees were considered nonlimiting for livestock, as were distances of 0-1/4 mile from water. The availability coefficient would be 1.00 or 100 percent of the total AUMs available to livestock. Since 82 percent of all observations were on slopes of 0-10 degrees, 18 percent would have occurred on slopes of greater than 11 degrees. Although 13 percent of the observations occurred on slopes of 11-25 degrees, the figure used for the 11-25 degree category was 0.18; 18 percent of the total observations occurred on slopes steeper than 11 degrees, and it was concluded that 5 percent differential use on slopes of 26-35+ degrees could just as likely occur on the 11-25 degree slopes.

Slope gradients for each section were determined by means of aerial photo interpretation and use of topographic maps with contour intervals.

Distances to known water sources were obtained from questionnaires received from livestock permittees, information provided by FWS field personnel, and locations of wells, ponds, and springs shown on topographic maps and range survey aerial photos. Named creeks appearing on Geological Survey topographic maps as either permanent or seasonal streams were considered to be reliable water sources unless information provided by field personnel indicated that the source was not utilized by livestock.

Slope gradients for each category on the slope-water matrix were measured and determined for each range site and tallied with water criteria to get acreages by each slope and water class. The availability coefficient (Appendix Table 15a) was then applied to the interim AUM figure derived from the range site and condition survey for each particular range site. This process determined a maximum recommended livestock stocking guide based upon the slope-water matrix.

In examining range sites which would be considered to be key cattle areas, the following sites would be most important in terms of forage production and suitability:

1. overflow
2. sandy
3. silty
4. clay
5. thin hilly (0-10 degree slopes)
6. shallow clay (0-10 degree slopes)
7. panspots
8. dense clay

Present key deer and elk use areas would include the following sites:

1. olay (areas of light cattle use)
2. thin hilly
3. shallow clay
4. panspots (areas of light cattle use)
5. dense clay (areas of light cattle use)
6. shallow clay-shale complex
7. thin breaks
8. shale

Areas which may assume key importance for pronghorns, elk, and deer for short periods may include:

1. saline lowland (emergency food)
2. thin breaks (security cover)
3. saline upland (emergency food)
4. badlands (security cover)

An attempt to quantify all criteria influencing distribution and use of forage by livestock and wildlife in terms of a mathematical equation is not easy. Other factors such as age class and breed of cattle may affect distribution patterns considerably. Yearlings are especially prone to be more slope and water independent than mature animals. Season of use may affect distribution patterns somewhat with animals tending to concentrate near water in hot weather and to range further from water during cooler fall weather. Although these variables may not be identical today, Mackie's observations (Mackie 1970) were taken of all the livestock on his study area during the four-year observation period and included various age classes, seasons of use, and breeds of cattle. Information in present range publications indicates that the slope-water criteria presented above is comparable with data from other areas. The Forest Service (1964) indicated studies in the Stansbury Mountains in Utah revealed that most of the range classed as suitable was on slopes of 5-18 percent. Julander and Jeffrey (1964) found that cattle in Utah made little use of slopes greater than 30 percent, restricting most of their use to slopes of less than 10 percent. In Montana, Mueggler (1965) found that areas 200 yards up 30 or 60 percent slopes are occupied only 20 and 11 percent respectively as much as areas at the bottom. Slopes greater than 50 percent are generally considered unsuitable for livestock grazing (Bureau of Land Management 1976).

In regard to water, Skovlin (965) indicated that cattle will seldom graze more than 1/2 mile from water where slopes are in excess of 40 percent. The Forest Service agrees that cattle should not be forced to go over 1/2 mile from water in rough terrain or forced to go more than 2 1/2 miles even on level terrain. Skovlin indicated cattle could travel up to 3 miles for water on gentle ground but would not be found that far away in summertime unless forage was gone for some distance about the water supply.

Soils limitations in the form of insufficient vegetation or erosive hazard provided a final consideration for AUM allocations. V. Larsen (personal communication) revealed certain soils mapping units which should be excluded from grazing (Appendix 7). These mapping units were excluded from the AUM allocations during final compilations.

The fourth and final step in livestock AUM calculation was reviewing AUM recommendations to this point in light of the area's wildlife objectives. Where Habitat Evaluation Procedures data (Appendix 2) suggested an additional need, further reductions were made for big game forage or residual cover for sharp-tailed grouse and other wildlife species.

In the final analysis it must be remembered that the range site and condition inventory as presented in the SCS National Range Handbook is primarily a livestock-oriented inventory tool. As such, it has limitations when applied to wildlife needs. Animals such as elk, which have diets similar to cattle, can be considered along the same basic lines when it comes to allocating forage. Other needs for elk, such as security cover, shrubs, and interspersion of habitat, are not so clear cut nor are the needs of deer and pronghorns or other less obvious wildlife species. However, it serves an important function as a management tool because it expresses present vegetation in terms of its potential climax. By examining what is present on the site and knowing wildlife needs for that site, a decision can be made as to the treatment to be employed to obtain the desired result.

Appendix 16. Literature review for Charles M. Russell National Wildlife Refuge, Montana, range survey and wildlife-livestock interrelationships.

Consideration of interrelationships between livestock and wildlife is the basis for making recommendations for the benefit of all wildlife species on CMR. Such interrelationships have been much discussed by wildlife manager. Whereas intensive livestock grazing may be detrimental to wild ungulates, prescribed grazing treatments have been found to benefit some ungulates and other wildlife species. Complete elimination of livestock grazing on the refuge would eliminate a management tool the manager has at his disposal.

Smith (1977) stated, "Livestock grazing is the single most important factor limiting wildlife production in the west. It has been and continues to be administered without adequate consideration for wildlife, especially on federally owned lands." Mackie (1978) reported that very few studies have been attempted in which more than a few of the possible effects and processes of competition and other grazing impacts have been considered. Most measure only short-term effects. More importantly, few studies have ever attempted to compare behavior and performance of wild ungulate populations between similar adjacent grazed and ungrazed ranges. Mackie (1978) stated that livestock grazing did not become established as an important factor until the mid-1880's, with the resulting disruption of habitat and interspecific relationships between grazing ungulates being of rather recent occurrence. Mayr (1963) observed that intense competition can occur when two species initially come into contact or where a radical change in the environment has upset a previous balance. Because of this rather recent introduction of domestic livestock onto western rangelands, changes have occurred in vegetative conditions and composition at an accelerated rate, along with the adaptations by wildlife species to adjust to these rapidly changing conditions.

Direct negative impacts resulting from livestock grazing cited by Mackie (1978) include direct competition for food, cover, and space. Food requirements may be nearly identical, as between cattle and elk for most of the year, or may overlap for only short, often critical periods such as between cattle and deer during early spring growth of grasses and forbs. As grazing pressure increases, there is a greater tendency for diet overlap to occur. Trampling becomes important with heavier livestock use. Pearson (1975) reported that direct forage consumption accounted for only 36-47 percent of the total herbage removed or lost where cattle are grazed, with trampling accounting for the remainder.

Season of use may affect livestock-wild ungulate interrelations according to Mackie (1978). Fall and spring range may be limited in extent; utilization by livestock of critical winter ranges after plant growth is completed may have an adverse impact on wildlife. Alterations of cover by livestock may be a direct negative impact on wild ungulates when calving or fawning time occurs because of the tendency of these animals to have young in somewhat open, low shrub-grass cover types. Reductions or loss of cover could result in increased losses to predation or weather.

Feeding behavior of wild ungulates may be greatly influenced by presence and grazing of livestock. McMahan (1964) observed that white-tailed deer used significantly more browse and generally more grass and less forbs on season-long livestock grazed pastures as compared with an ungrazed area. Knowles (1976) found heavier use of forbs, especially yellow sweet clover, by mule deer in an ungrazed pasture compared to a livestock grazed pasture where deer utilized more browse. Buechner (1950) reported that pronghorn diets may be greatly altered on over-grazed cattle range, while overgrazed sheep range is unsuitable for pronghorn use. Distribution and movements of mule deer and elk in north central Montana may be influenced by occurrence of livestock on rangelands (Knowles 1975, 1976). Komberec (1976), McMahan (1966), Ellisor (1969), Firebaugh (1969), Dusek (1971), and Hood and Inglis (1974) suggested that livestock may interfere with deer use of all available habitats and may exclude deer use from some areas. Movements of elk from areas used by livestock have been reported by Jeffrey (1963), Dalke et al. (1965), Stevens (1966), Skovlin et al. (1968), Mackie (1970), Stark (1972), and Lonner (1975).

Mackie (1978) stated that indirect negative impacts by livestock on wildlife include gradual reductions in vigor of plants and quality of forage available, elimination or reduction in reproductive parts or vigor of plants such that future forage is diminished, elimination or reduction of important cover types and replacement by less favorable types, and alterations or reductions in the kinds, quality, or amounts of preferred plants through selective grazing. Where grazing is uniform or becomes so over large areas, vegetational diversity may be decreased.

Some individuals believe that livestock grazing is inherently or largely detrimental to wild ungulates as a result of these long term influences. Gallizioli (1977) considered overgrazing by livestock to be a major factor in destruction of deer and other wildlife habitat in the southwest. Severson and Bolt (1978) indicated that heavy livestock grazing on the northern Great Plains appears to have been a major factor in reduction of deciduous trees and shrubs along drainage ways. Such cover types may be critical to mule deer and other wildlife species of the area. Mackie (1978) indicated that diversity of cover types may be important, if not essential, to mule deer. Irregular or spotty heavy grazing by livestock earlier may have contributed to this situation. More uniform distribution resulting from more intensive grazing systems or improved water distribution could result in less desirable conditions for deer.

The aspect of competition between wildlife and livestock was recognized by Smith and Julander (1953) as occurring in two forms -- forage competition, which occurred if the supply of forage used in common was not adequate to meet both species' requirements within proper use limits for the species, and land use competition which may occur even with adequate forage but where lesser usage by one specie would allow greater usage or numbers of the other species to occur. Mackie (1976) pointed out that it is quite difficult to effectively evaluate range relationships, competition, and management needs of wild ungulates and other wildlife. He mentioned that he did not measure diet preferences but rather the response of deer and elk to livestock presence and grazing, noting that elk tended to avoid areas presently or previously grazed by cattle. He expressed interest in the potential of "social intolerance" as cited by Lonner (1975). Recent Missouri River breaks studies involving pastures where no livestock grazing occurred or on rested pastures in a rest-rotation system showed strong differences in wild ungulate distribution and use in relation to cattle distribution and use (Knowles 1975, Komberec 1976). Knowles (1975) observed that deer either moved or used all parts of their home range when cattle were turned into previously ungrazed pastures. Skovlin et al. (1968) reported that elk use was significantly less on range cohabited with cattle than in areas where cattle use was restricted. Rates of elk use decreased as cattle stocking increased; however, moderate cattle stocking inhibited elk as much as heavy cattle stocking.

Skovlin et al. (1968) concluded that a light stocking rate promoted maximum sustained use of forage for livestock and wildlife. Where livestock production is the primary objective, moderate stocking would best fulfill the objective. Skovlin and Harris (1970) found that elk preferred season-long cattle ranges to deferred rotation ranges when cattle stocking was light. However, elk preferred heavily stocked rotation ranges to heavily stocked season-long ranges. Nelson and Burnell (1975) evaluated elk-cattle competition on pastures in a rotational grazing system and found that cattle and elk interacted significantly for both forage and space. Distribution patterns showed moderate overlap, and diets overlapped significantly. Social interaction between the two groups resulted in elk leaving the pasture to which cattle were moved, and elk were not observed to use the pasture used by cattle following cattle removal, except those areas within that pasture which were ungrazed by cattle.

Range improvements such as fencing and water developments often result in better range management as a result of improved distribution, more uniform utilization of forage, and less damage to soil and range resources. Mackie (1978) pointed out that while this may benefit the range resource, effects on wild ungulates may be detrimental. Fences can interfere with migrations and access to habitats for wild animals. Direct morality may also occur as a result of crossing fences. Papez (1976) found that 13 percent of 144 mule deer mortalities to factors other than hunting, crippling and winter kill were fence kills. As in the case of fencing, Mackie (1978) stated that in the development of water, "The expected effect may be the opposite by extending livestock use generally to previously little or only seasonally grazed areas and habitat types such that overlap or opportunities for overlap in use of resources are increased. This may be true on long continuously grazed ranges or on seasonally grazed ranges where stocking rates may be high." Additionally, uniform grazing patterns may result in the adverse effect of decreasing vegetation diversity of an area.

Effects of various grazing livestock systems upon wild ungulates have been discussed to some extent earlier in this section. Skovlin et al. (1968) observed deer and elk use on dual use livestock-big game ranges and single use big game-only ranges. Big game made the greatest use of range where cattle did not graze. Deer had a tendency to utilize the deferred rotation pastures more than the season-long pastures. No significant use difference was found between single and dual-use pastures for deer or for the three stocking levels on the dual-use pastures. Elk, however, utilized the game-only pastures at a significantly higher level than on dual-use pastures. As cattle stocking increased on the dual-use ranges, elk use decreased significantly, apparently because of greater abundance of ungrazed forage in the deferred units. Under light stocking, elk preferred season-long pastures, but under heavy stocking they preferred rotation pastures. As mentioned previously, light stocking was found to be the most desirable system.

Knowles (1975) found that in a rest-rotation grazing system in the Missouri Breaks, mule deer distribution and movements appeared to be affected by grazing treatments, and fawn production and survival may have been depressed in pastures receiving heavy grazing. Elk responded to the grazing by moving from grazed to ungrazed pastures without apparent effect. Heavy grazing use such as might be found on rest-rotation system grazed pastures leaves little residual vegetation and may increase the vulnerability of young animals to predation. Populations of microtine rodents may be reduced, forcing predators to seek alternate food sources, including wild ungulates.

Wittinger (1978) indicated that the dietary overlap between elk and deer was significant on rest-rotation pastures in Idaho. However, elk moved out of areas used by cattle, which lessened direct competition for forage but also limited the range area available to elk. No adverse effects on the elk population were noted during the study as a result of this situation.

Anderson and Scherzinger (1974) reported on a rest-rotation grazing system to improve winter elk forage in Oregon. Cattle were moved onto the range following range readiness and moved off the range at the midpoint of the growing season. The regrowth was then made available to wintering elk in the area. This system resulted in an increase in livestock forage because of improved range condition and an increase in elk use as a result of regrowth of high quality winter feed.

Mackie (1978) indicated that the often overlooked area of interspecific competition between wild ungulates may be intensified by livestock use. Elk tend to overlap both cattle and deer somewhat in terms of diet and distribution. Elk also tend to avoid cattle or areas grazed by cattle whenever possible. Areas not accessible to cattle are often highly important deer habitat areas. This tends to intensify competition between elk and deer. Changes in livestock practices may affect deer-elk relations in addition to deer-cattle and elk-cattle.

Beneficial impacts may result from dual use of rangeland by domestic livestock and wild ungulates. Use by livestock may result in greater diversity in the habitat, thus indirectly benefitting certain wildlife species. Overgrazing of many intermountain ranges ultimately benefited deer populations by allowing browse species to invade lands formerly occupied by grasses. Mackie (1978) stated that while heavy or abusive grazing during one season may be destructive to wild ungulate habitat values, lighter grazing or grazing at another season may increase the availability of plants or have other beneficial habitat impacts. Mackie indicated that while a livestock grazing impact may benefit one species, it may detrimentally affect another. Longhurst et al. (1968, 1976) indicated that retrogressive succession from grasses and forbs to browse may have eliminated bighorn sheep while benefitting mule deer. Cosby (1978) reported that a planned livestock grazing system benefits both wildlife and the range in addition to providing livestock forage. Cosby recommended a rotation deferred grazing system to improve wildlife conditions. He mentioned a case of rotation by deer that coincides with livestock, where deer follow cattle to make use of succulent regrowth.

Anderson and Scherzinger (1974) indicated that elk habitat of the Bridge Creek Wildlife Management Area in Oregon was improved by implementation of a planned grazing program for livestock as well as improvement of range conditions. Elk made use of the regrowth on the management area following livestock removal. Cattle grazing was heavy enough to "top-off" grazed pastures, but light enough to leave an adequate volume of forage for elk in all pastures following livestock removal.

Mackie (1978) concluded one report with the observation that the probability of conflict between wild ungulates and livestock is high, and some negative impacts may be inescapable whenever livestock grazing occurs on range occupied by wild ungulates. He indicated that information is lacking with respect to impacts of grazing on wild ungulates. However, he cited numerous studies that have occurred in Montana and other western states which indicate that livestock grazing is detrimental to deer and elk. One study on nine state game ranges in Montana revealed that wintering elk numbers have increased an average of at least 100 percent following livestock removal.

Analysis of effects of livestock grazing upon ground nesting birds generally reveals that diversity of species and nesting densities are higher in undisturbed habitats than where grazing is allowed (Kirsch 1969). Quantity and quality of cover generally are adversely affected by grazing and trampling which affect density of nests and may affect nesting success because of predation on areas having reduced cover (Creston Valley Wildlife

Management Authority 1974). Certain species such as the prairie horned lark, western meadowlark, and mountain plover benefit from moderate grazing intensities, however (Smith 1940, Karuziak et al. 1977). Sisson (1976) indicated that sharp-tailed grouse in Nebraska preferred climax vegetation sites having relatively open canopy and sparse current growth with accumulation of plant litter. This probably indicated avoidance of cool season grasses and forbs as well as a preference for residual cover of warm season grasses. Accumulation of litter on favored sites was attributed to very light or no livestock grazing. Christenson (1971) concluded that uniform stands of vegetation at least 12 inches high or patches of vegetation at least 14 inches high were necessary for nesting. He proposed that regulation of grazing to maintain uniform stands of vegetation at least 12 inches high might substantially increase grouse populations. Sisson's conclusions in his report were that grouse requirements differ from those considered desirable from a livestock production standpoint. Interspersion of cover and habitat diversity are generally reduced by high intensity grazing systems. Sisson stated that diversity of vegetation resulting from selective grazing (as opposed to planned, high intensity grazing systems) by livestock and wild herbivores would be expected to contribute to long term stability and productivity of the system. This concept should be carefully considered in evaluating impacts of this type system versus intensive grazing systems.

Effects of grazing upon small mammals may vary by species and grazing intensity. Flinders and Hansen (1975) reported that black-tailed jackrabbits were most abundant on light to moderately grazed ranges. Turner (1969) reported that pocket gopher activities appeared greater on ungrazed than grazed ranges. Cover is essential to sage vole survival, whether it be growing or litter. According to Maser (1972), cover provides some needed protection from predators for small mammals which are active during daylight. Deer mice, being nocturnal, are not so limited by cover limitations. Other small mammals such as prairie dogs appear to thrive in areas which have been abused in the past. Once the tall perennial grasses have been removed, prairie dogs are able to maintain a lowered state of plant productivity and site quality through colonial activities.

In summary, an examination of the available literature reveals only few situations in which livestock grazing benefits wildlife. Deer and small mammal populations have often responded dramatically to range overuse which replaces climax species with those more palatable or conducive to populations of the benefitting wildlife species. In certain situations, removal of old, cured vegetation will make plant regrowth more palatable to wildlife species. Removal of excess, old forage will also allow establishment of new individual plants, thus improving range and watershed conditions. A look at the wildlife species priority list under which proposed management priorities will be developed for CMR reveals that mule deer, sharp-tailed grouse, and elk will be the species having the greatest importance in terms of management impacts. All three species are affected to varying degrees by livestock grazing.

An analysis of available literature concerning livestock-wildlife interrelationships results in the following conclusions:

1. Grazing by livestock has relatively few beneficial impacts upon wildlife.

2. Under light grazing intensities, livestock grazing is probably a "no-harm, no-good" situation in relation to most wildlife populations. Interspersion of habitat conditions which may result from light, selective livestock grazing may enhance certain wildlife species which require a vegetative mosaic for optimal habitat conditions.

3. Moderate and heavy livestock grazing intensities provide ever increasing detrimental effects upon most wildlife species. Certain species such as prairie dogs and mule deer may be positively affected by range overuse. Moderate livestock grazing rates would apply where wildlife values are not to be considered the major or dominant use.

4. Under light livestock grazing intensities, seasonal grazing appears to provide the best answer for CMR. Such a system should result in livestock activities being primarily confined to major coulee bottoms and ridgetops of gentle relief. Light stocking rates would help provide proper use of such areas; the majority of the refuge, which contains steeper topography, would be reserved for wildlife use.

5. Under moderate grazing intensities, implementation of an intensive grazing system such as rest-rotation would appear to offer the best solution for wildlife populations. A three or four pasture rest-rotation system would provide sanctuary for wildlife on the rested pastures when livestock are present on the pasture to be grazed. However, wildlife species with small home ranges would be adversely affected because of removal of food and cover during the "grazed" portion of the rotation cycle. Such a system would require development of additional water facilities and more fencing, both of which may be detrimental to wildlife. Water development allows better distribution of cattle and and allows them to penetrate sanctuaries formerly reserved for wildlife. Fencing impedes wildlife movements. If the decision is made to implement such a system, the "stocking rate is based on the forage that is produced on the portion of the range that is open for use each year" (Hormay 1970). Moderate grazing intensities should be applied where multiple use concepts are to be employed.

6. Livestock grazing should be regarded as a management tool to enhance wildlife populations. Flexibility should be an inherent part of the system; numbers should be modified in part by forage production during a given year. Introduction of heavier than normal livestock numbers temporarily into a pasture to remove rank vegetation could also be a management objective.

The feeling as to reasons why a wildlife refuge should contain domestic livestock is perhaps best summarized by Murie (1935): "I might mention that cattle here and there, if not so numerous that one is apprehensive about the range, also fit into the picture. There is something picturesque about the old time cattle ranch, although the outdoorsmen would not like to have that feature to pervade the entire field. Simplicity on a grand scale is the keynote of this whole outdoor picture."

Appendix 17. Methodology for estimating visitor use on the Charles M. Russell National Wildlife Refuge, Montana.

Although estimates of visitor use on the refuge have been made in the past, reliability of this information is tempered by a number of variables. The refuge is accessible by road, trail, horseback, foot, water, or other means at many locations. Only in a few areas is access controllable, such as at developed recreation areas. Thus, it is almost impossible to sample the many access routes and determine the amount of use the area receives. This is further complicated by the fact that three majcr highways cross the refuge: State Highways 24 and 117 on the east, and US Highway 191 on the west.

For purposes of this study, total visitation was estimated for dispersed recreation areas, developed recreation areas, and the Upper Missouri National Wild and Scenic River. Dispersed recreation areas constitute the bulk of undeveloped land and water surface on the refuge, as contrasted to developed recreation areas administered by COE and MDFWP. The nationally designated wild and scenic river segment at the west end of the refuge is administered by BLM.

Dispersed area visitation

Dispersed areas were divided by the level of use they receive: high, medium, or low. These areas were determined by traffic count data, field observations, and professional judgment. Traffic count data were only available for a three-month period during the summer involving four traffic counters. Reductions were made in total counts to compensate for traffic not directly involved in recreation. Visitation for each type of area was calculated with these data, assuming that the amount of use they receive is in proportion to the volume of traffic on major highways crossing the refuge.

Participation rate factors derived from a preliminary survey of recreation use on the refuge (Fish and Wildlife Service 1978) were then applied to the estimate of visitors on dispersed use areas to obtain a measure of current visitation by activity (activity days). Based on survey data, activity days were converted to recreation days using a factor of 3.8, which represents the average number of activities in which an individual participates while visiting the refuge. Recreation days were then divided in half to obtain the number of visitor days, since a visitor day is half as long as a recreation day.

Since the year in which the previously referenced visitor survey was conducted was atypical due to bad weather, which restricted access by sportsmen, hunting and fishing use estimates were related to the Montana Statewide Comprehensive Outdoor Recreation Plan (Montana Department of Fish and Game 1978) for State Planning Regions 4, 6, and 7.

Developed area visitation

Since only partial information was available from COE on amount of visitation at developed recreation areas, it was necessary to estimate use at these areas. In calculating this visitation, a distinction was made between nearby recreation areas and outlying recreation areas. The primary difference between these two types relates to proximity of the areas to local service establishments. Nearby areas are those located close to the town of Fort Peck, where there are a number of opportunities to obtain food, lodging, entertainment, and related services. In contrast, outlying areas are from 10-40 miles or more from the nearest service facilities.

Using traffic count data compiled by COE (R. King personal communication), the number of total counts recorded at nearby and outlying areas was determined. It was estimated that a visitor to nearby areas would make an average of six trips to and from local service facilities during his stay, while those who visit outlying areas would make a minimum of two trips during their stay.

Dividing traffic count data for nearby and outlying areas by the average number of trips made in and out by each vehicle provided an estimate of the number of vehicles at COE and State facilities. Multiplying the resulting figure times 2.68, which represents the average number of people/vehicle (Fish and Wildlife Service 1978), yielded an approximation of the number of visitors. As with dispersed areas, participation rate factors were applied to this visitation to obtain estimates of use by activity and then converted

Wild and Scenic River Visitation

Based on BLM data (W. Cutler personal communication), it was assumed that about 30 percent of the floaters on the Upper Missouri National Wild and Scenic River traverse that portion of the river through the refuge during the primary use season. River use during the balance of the year is unknown but thought to be minor.

Projections of visitation

Due to growing scarcity and rising cost of fuel for transportation as well as numerous competing recreation resources available outside CMR, the impact of recreationists on the refuge in future years was assumed to be primarily dependent on local and regional changes in population. Thus, estimates of future use on the refuge under the Proposed Action alternative were based on anticipated population increases in the 150-mile area immediately surrounding the refuge (Appendix Table 17a). Anticipated visitation under the other alternatives was based on variation in facilities and opportunities that would be provided by each. It was assumed that this use would be divided between dispersed areas, developed areas, and the wild river in about the same proportions as 1978.

Appendix Table 17 a. Recreation visitation projections under each management alternative for the Charles M. Russell National Wildlife Refuge, Montana.

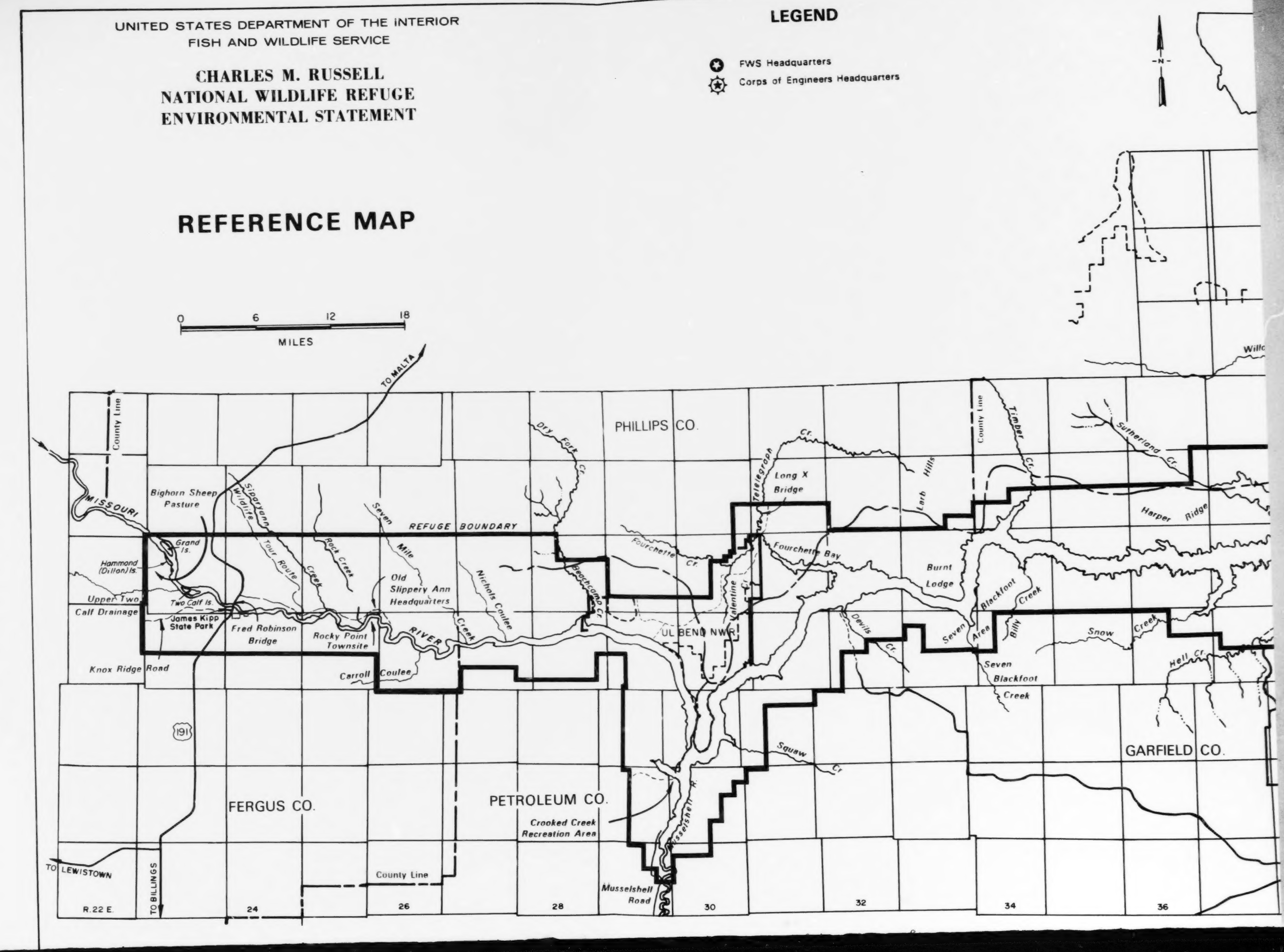
Activity	Present situation 1978	No Action 1990	No Action 2005	Proposed Action 1990	Proposed Action 2005	Intensive Wildlife Management 1990	Intensive Wildlife Management 2005	Multiple Use 1990	Multiple Use 2005	No Grazing 1990	No Grazing 2005
	Annual visitor days (thousands)										
Wildlife related											
Cultural studies	*	*	*	*	*	*	*	*	*	*	*
Environmental education	*	*	*	*	*	*	*	*	*	*	*
Viewing scenery and exhibits	104	105	107	105	107	105	106	107	110	105	107
Hunting											
Elk	4	4	4	4	5	4	5	4	4	4	5
White-tailed deer	*	*	*	*	*	*	*	*	*	*	*
Mule deer	5	5	5	6	7	7	8	5	5	6	7
Sharp-tailed grouse	1	1	1	1	1	2	2	1	1	2	2
Sage grouse	*	*	*	*	*	*	*	*	*	*	*
Pronghorns	1	1	1	1	1	1	1	1	1	1	1
Fishing											
Paddlefish	3	4	4	4	4	4	4	4	4	4	4
Lake fish	48	62	73	60	79	64	85	64	91	62	81
Nature observation	3	3	3	4	5	4	7	3	4	4	5
Wildlife photography	2	2	2	3	4	3	5	2	3	3	4
Backcountry travel-motor	1	1	1	2	3	1	2	2	3	2	3
Backcountry travel-nonmotor	*	*	*	1	1	1	2	1	1	1	1
Nonwildlife related											
Camping	32	33	35	33	34	30	25	33	35	33	34
Picnicking	77	78	80	78	79	75	68	78	81	78	79
Beach swimming	15	16	17	16	17	13	10	16	18	16	17
Powerboating	38	40	44	39	39	35	30	39	42	39	39
Nonpowerboating	6	21	28	21	28	23	30	25	30	21	28
Water skiing	11	11	12	11	11	9	6	12	13	11	11
Backpack/hike trails	*	*	*	1	2	1	3	1	3	1	2
Visit hist./arch. sites	1	1	1	1	2	1	2	1	2	1	2
Horseback riding	*	*	*	*	*	*	*	1	2	*	*
Other	2	2	2	2	2	2	2	2	3	2	2
Total	357	393	424	396	433	390	404	405	458	398	435

*Less than 1,000 visitor days.

UNITED STATES DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE

CHARLES M. RUSSELL NATIONAL WILDLIFE REFUGE ENVIRONMENTAL STATEMENT

REFERENCE MAP



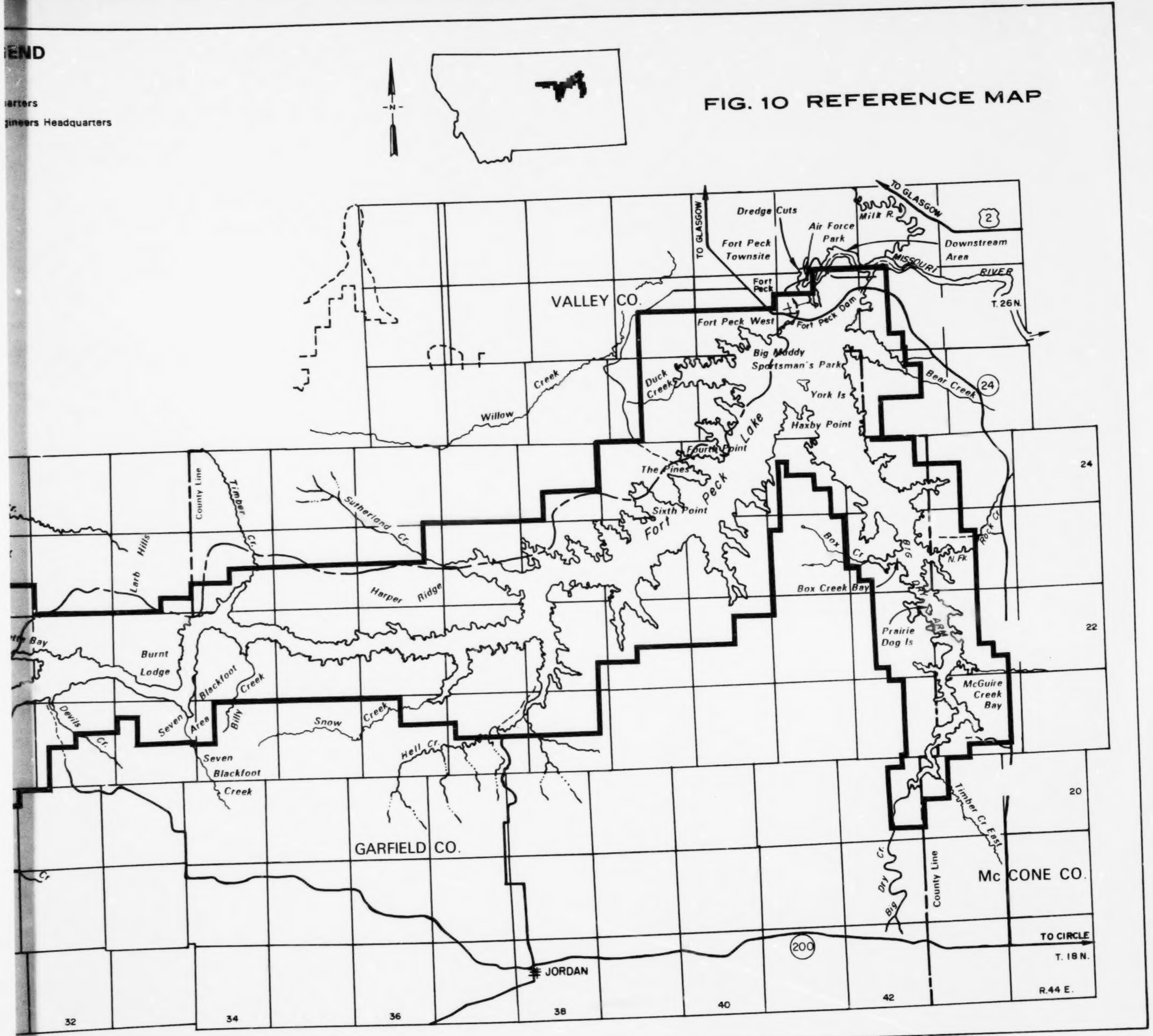


FIG. 10 REFERENCE MAP

VIII. GLOSSARY

VIII. GLOSSARY

ALLOTMENT. An area designated for use of a prescribed number and kind of livestock under a plan of management.

ANIMAL-UNIT-MONTH (AUM). The amount of feed or forage required by a 1,000 pound animal for one month.

AUM. Animal-unit-month

BLM. Bureau of Land Management, U.S. Department of the Interior.

CARRYING CAPACITY. The maximum number of animals an area support without inducing damage to vegetation or related resources. It may vary from year to year on the same area due to fluctuating forage production.

CLASS OF LIVESTOCK. Age, sex-group, or species of livestock.

CMR. Charles M. Russell National Wildlife Refuge, Fish and Wildlife Service, U.S. Department of the Interior.

COE. Corps of Engineers, U.S. Department of the Army

COMMON ALLOTMENT. An allotment upon which several permittees graze livestock in common.

CONTINUOUS GRAZING. The grazing of a specific unit by livestock throughout the year or for that part of the year during which grazing is feasible. The term is not necessarily synonymous with yearlong grazing.

CROSS-FOSTERING. Putting eggs or young of one species of bird into the nest of a second species to be raised by the adopting parents.

DANCING GROUND. A traditional gathering site where the courtship ritual between male and female sharp-tailed grouse occurs. Nesting and rearing areas are almost always close by.

DIRECT ECONOMIC EFFECT. Income generated only by the economic sector (such as the livestock industry) to which a reference is made.

DISCOUNTED. Brought back to a present equivalent value, interest rate used was 7 1/8 percent.

DISPERSED RECREATION USE. Scattered recreation activity that occurs away from developed recreation areas.

DNC. Cover such as a mix of legumes and grasses used by waterfowl and some upland birds for nesting.

ECOTONE. A transition area of vegetation between two communities, having characteristics of both kinds of neighboring vegetation as well as characteristics of its own. Varies in width depending on site and climatic factors.

EDGE EFFECT. The influence of one adjoining plant community upon the margin of another affecting the composition and density of the population of plants and animals. Wildlife abundance and diversity normally varies with the amount of edge.

EMERGENT. Rooted vegetation which grows above the surface of the water.

ENDANGERED SPECIES. Any species which is in danger of extinction throughout all or a significant portion of its range.

FALL STAGING AREA. An area where a number of individual animals of a species temporarily congregate in late fall before snow, ice, and cold weather forces them to winter habitat. During mild winters, wildlife may stay in staging areas the entire season.

FWS. Fish and Wildlife Service, U.S. Department of the Interior.

HEAVY GRAZING. More than 50 percent utilization of annual available forage.

HEDGED CONDITION. Shrubs which resemble trimmed hedges, usually because of browsing by herbivores.

INDIRECT ECONOMIC EFFECT. Income produced in one or more economic sectors (such as retail trade) by the receipt of income in another economic sector (such as the livestock industry).

LIGHT GRAZING. Between 0-35 percent utilization of annual available forage.

LITTORAL. Shore zone between high and low water marks characterized by vegetation development which is used for stabilization of the shoreline and spawning for various fish species.

MDFWP. Montana Department of Fish, Wildlife and Parks.

MDSL. Montana Department of State Lands

MODERATE GRAZING. Between 35-50 percent utilization of annual available forage.

NATIONAL NATURAL LANDMARK. An area set aside that possesses exceptional value or quality in illustrating or interpreting the national heritage of our nation.

NATIONAL REGISTER OF HISTORIC PLACES. The official list of the nation's cultural resources worthy of preservation.

NATURAL AREA. An area set aside indefinitely to preserve a representative unit of a major forest, grassland, or wetland type primarily for the purposes of science, research, and education.

NPS. National Park Service, U.S. Department of the Interior.

PARENT MATERIAL. Unconsolidated mineral or organic matter from which soils are developed.

PRESCRIPTION GRAZING. Grazing by livestock designed to accomplish specific objectives. As used in this EIS, prescription grazing will be for the benefit of specific species of wildlife and will usually be a departure from the light, seasonal grazing generally proposed.

PRESENT VALUE. An amount of money which will become a given amount at a stated time in the future. For example, at 10 percent interest $100 will grow to $110 in one year; therefore, the present value of $110 one year from now at 10 percent interest is $100. If the end product is a series of payments, the present value is the amount that will result in the sums of that series.

RANGE IMPROVEMENT. 1) Any structure or excavation to facilitate management of range or livestock. 2) Any practice designed to improve range condition or facilitate more efficient utilization of the range. 3) An increase in the grazing capacity of range, i.e., improvement in range condition.

RANGE READINESS. The defined stage of plant growth at which grazing may begin under a specific management plan without permanent damage to vegetation or soil. Usually applied to seasonal range.

RANGE SITE. A distinctive kind of rangeland, which in the absence of abnormal disturbance and physical site deterioration, has the potential to support a native plant community typified by an association of species different from that of other sites. This differentiation is based upon significant differences in kind or proportion of species, or total productivity.

RESEARCH NATURAL AREA. An area on which natural features and processes are preserved with minimal human intervention for research and educational purposes. This designation differs from other classifications such as wilderness or refuge, in that the latter designations often have broader use-management objectives than the preservation/scientific applications of the research natural area.

RESIDUAL COVER. The vegetation, primarily grasses, remaining through the winter and into the spring that is available to wildlife for cover; usually applies to nesting cover for upland birds and waterfowl. Quality of residual cover varies with its height and density.

RIPPING (RANGE). The mechanical penetration and shearing of range soils to depth of 8 to 18 inches for the purpose of breaking hardpan layers to facilitate penetration of plant roots, water, organic matter, and nutrients. A range improvement practice used where native grasses of a rhizomatous nature can spread into the ripped soil.

ROTATION GRAZING. System of pasture utilization embracing short periods of grazing followed by periods of rest for herbage recovery during the same season. Variations of rotation grazing include deferred rotation and rest-rotation systems.

SCS. Soil Conservation Service, U.S. Department of Agriculture.

SECTION 7 CONSULTATION. Consultation with personnel of the U.S. Fish and Wildlife Service to determine environmental effects of contemplated actions on species listed as endangered or threatened under Section 7 of the Endangered Species Act.

SELF-FURNISHED AUMs. Livestock AUMs which are derived from privately owned or state leased land within the CMR boundary. The number of AUMs authorized is generally reflected on the grazing permit, but no fee is assessed by FWS for grazing.

SLB. State Land Board, Montana.

STRUTTING GROUND. A traditional gathering site where the courtship ritual between male and female sage grouse occurs. Nesting and rearing areas are almost always close by.

THREATENED SPECIES. Any species which is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

VISITOR CONTACT CENTER (VCC). A manned facility designed to provide general information.

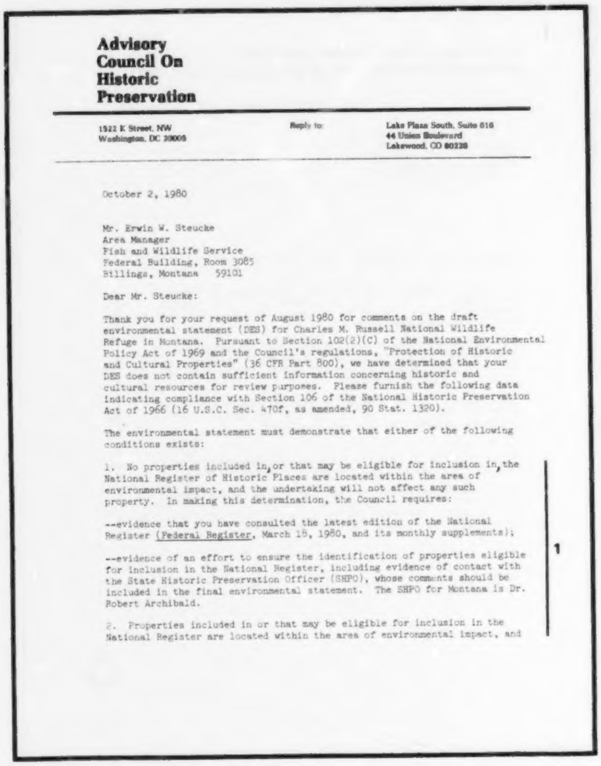
VISITOR CONTACT STATION (VCS). An unmanned facility designed for dispersing information.

VISITOR DAY. Participation by an individual in one or more recreation activities during all or part of a 12-hour period.

VISITOR INTERPRETIVE CENTER (VIC). A structure designed for full-scale interpretation using exhibits, displays, and other media.

WILDERNESS. An area which has not been seriously altered by man set aside by legislative action to preserve a representative unit of a major forest, grassland, or other land classification type.

IX. LETTERS OF COMMENT AND FWS RESPONSES - AUGUST 1980 DEIS



**Advisory
Council On
Historic
Preservation**

1522 K Street, NW
Washington, DC 20005

Reply to:

Lake Plaza South, Suite 616
44 Union Boulevard
Lakewood, CO 80228

October 2, 1980

Mr. Erwin W. Steucke
Area Manager
Fish and Wildlife Service
Federal Building, Room 3085
Billings, Montana 59101

Dear Mr. Steucke:

Thank you for your request of August 1980 for comments on the draft environmental statement (DES) for Charles M. Russell National Wildlife Refuge in Montana. Pursuant to Section 102(2)(C) of the National Environmental Policy Act of 1969 and the Council's regulations, "Protection of Historic and Cultural Properties" (36 CFR Part 800), we have determined that your DES does not contain sufficient information concerning historic and cultural resources for review purposes. Please furnish the following data indicating compliance with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. Sec. 470f, as amended, 90 Stat. 1320).

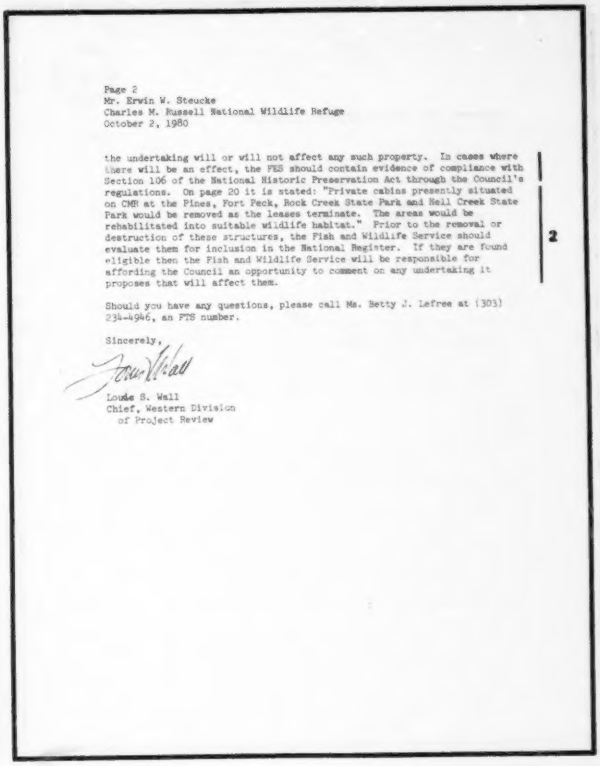
The environmental statement must demonstrate that either of the following conditions exists:

1. No properties included in, or that may be eligible for inclusion in, the National Register of Historic Places are located within the area of environmental impact, and the undertaking will not affect any such property. In making this determination, the Council requires:

--evidence that you have consulted the latest edition of the National Register (Federal Register, March 18, 1980, and its monthly supplements);

--evidence of an effort to ensure the identification of properties eligible for inclusion in the National Register, including evidence of contact with the State Historic Preservation Officer (SHPO), whose comments should be included in the final environmental statement. The SHPO for Montana is Dr. Robert Archibald. 1

2. Properties included in or that may be eligible for inclusion in the National Register are located within the area of environmental impact, and



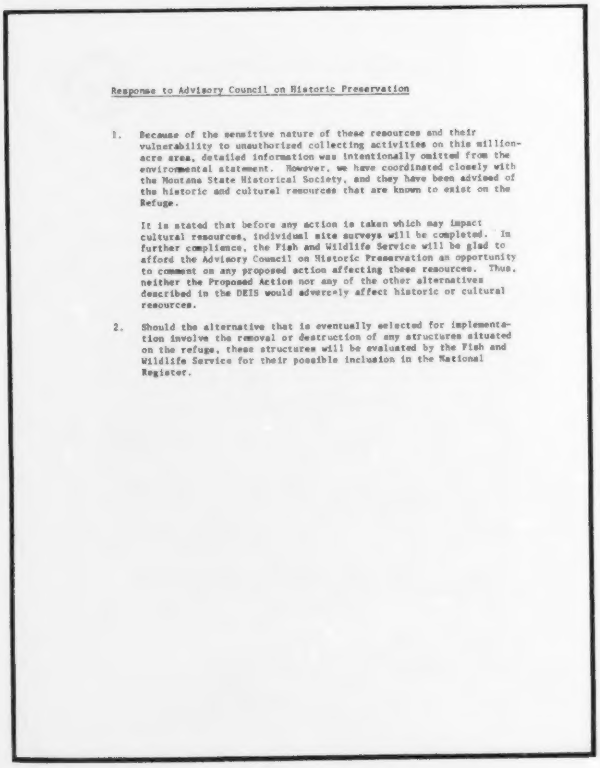
Page 2
Mr. Erwin W. Steucke
Charles M. Russell National Wildlife Refuge
October 2, 1980

the undertaking will or will not affect any such property. In cases where there will be an effect, the FES should contain evidence of compliance with Section 106 of the National Historic Preservation Act through the Council's regulations. On page 20 it is stated: "Private cabins presently situated on CMR at the Pines, Fort Peck, Rock Creek State Park and Hell Creek State Park would be removed as the leases terminate. The areas would be rehabilitated into suitable wildlife habitat." Prior to the removal or destruction of these structures, the Fish and Wildlife Service should evaluate them for inclusion in the National Register. If they are found eligible then the Fish and Wildlife Service will be responsible for affording the Council an opportunity to comment on any undertaking it proposes that will affect them. 2

Should you have any questions, please call Ms. Betty J. Lefree at (303) 234-4946, an FTS number.

Sincerely,

Louis S. Wall
Chief, Western Division
of Project Review

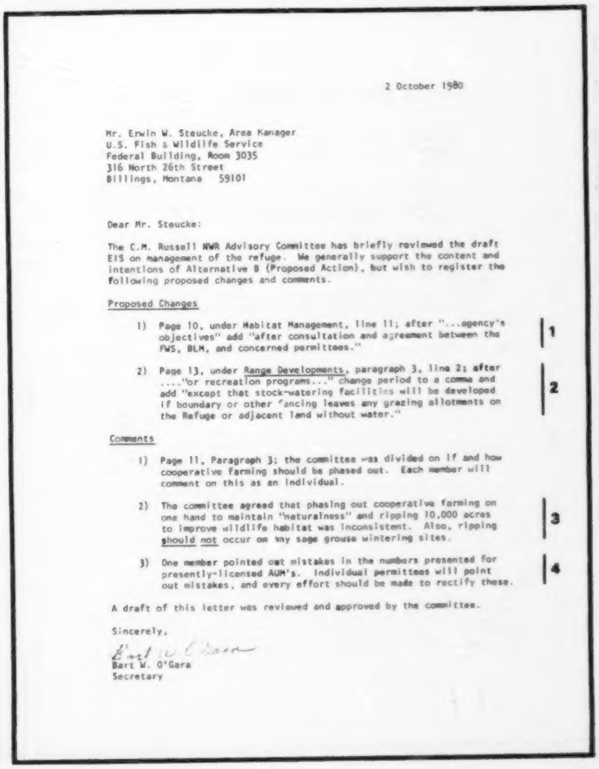


Response to Advisory Council on Historic Preservation

1. Because of the sensitive nature of these resources and their vulnerability to unauthorized collecting activities on this million-acre area, detailed information was intentionally omitted from the environmental statement. However, we have coordinated closely with the Montana State Historical Society, and they have been advised of the historic and cultural resources that are known to exist on the Refuge.

   It is stated that before any action is taken which may impact cultural resources, individual site surveys will be completed. In further compliance, the Fish and Wildlife Service will be glad to afford the Advisory Council on Historic Preservation an opportunity to comment on any proposed action affecting these resources. Thus, neither the Proposed Action nor any of the other alternatives described in the DEIS would adversely affect historic or cultural resources.

2. Should the alternative that is eventually selected for implementation involve the removal or destruction of any structures situated on the refuge, these structures will be evaluated by the Fish and Wildlife Service for their possible inclusion in the National Register.



2 October 1980

Mr. Erwin W. Steucke, Area Manager
U.S. Fish & Wildlife Service
Federal Building, Room 3035
316 North 26th Street
Billings, Montana 59101

Dear Mr. Steucke:

The C.M. Russell NWR Advisory Committee has briefly reviewed the draft EIS on management of the refuge. We generally support the content and intentions of Alternative B (Proposed Action), but wish to register the following proposed changes and comments.

Proposed Changes

1) Page 10, under Habitat Management, line 11; after "...agency's objectives" add "after consultation and agreement between the FWS, BLM, and concerned permittees." 1

2) Page 13, under Range Developments, paragraph 3, line 2; after ...."or recreation programs..." change period to a comma and add "except that stock-watering facilities will be developed if boundary or other fencing leaves any grazing allotments on the Refuge or adjacent land without water." 2

Comments

1) Page 11, Paragraph 3; the committee was divided on if and how cooperative farming should be phased out. Each member will comment on this as an individual.

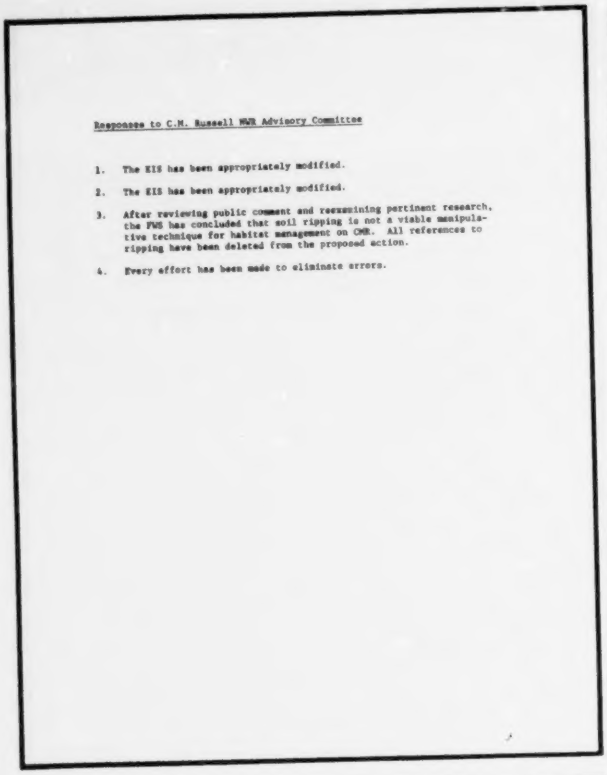
2) The committee agreed that phasing out cooperative farming on one hand to maintain "naturalness" and ripping 10,000 acres to improve wildlife habitat was inconsistent. Also, ripping should not occur on any sage grouse wintering sites. 3

3) One member pointed out mistakes in the numbers presented for presently-licensed AUM's. Individual permittees will point out mistakes, and every effort should be made to rectify these. 4

A draft of this letter was reviewed and approved by the committee.

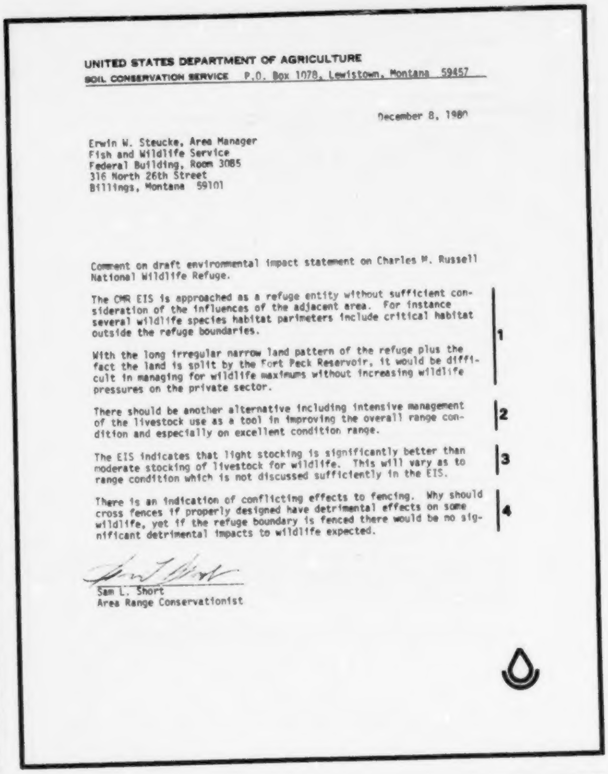
Sincerely,

Bart W. O'Gara
Secretary



Responses to C.M. Russell NWR Advisory Committee

1. The EIS has been appropriately modified.
2. The EIS has been appropriately modified.
3. After reviewing public comment and reexamining pertinent research, the FWS has concluded that soil ripping is not a viable manipulative technique for habitat management on CMR. All references to ripping have been deleted from the proposed action.
4. Every effort has been made to eliminate errors.



UNITED STATES DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE P.O. Box 1078, Lewistown, Montana 59457

December 8, 1980

Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3085
316 North 26th Street
Billings, Montana 59101

Comment on draft environmental impact statement on Charles M. Russell National Wildlife Refuge.

The CMR EIS is approached as a refuge entity without sufficient consideration of the influences of the adjacent area. For instance several wildlife species habitat parimeters include critical habitat outside the refuge boundaries.

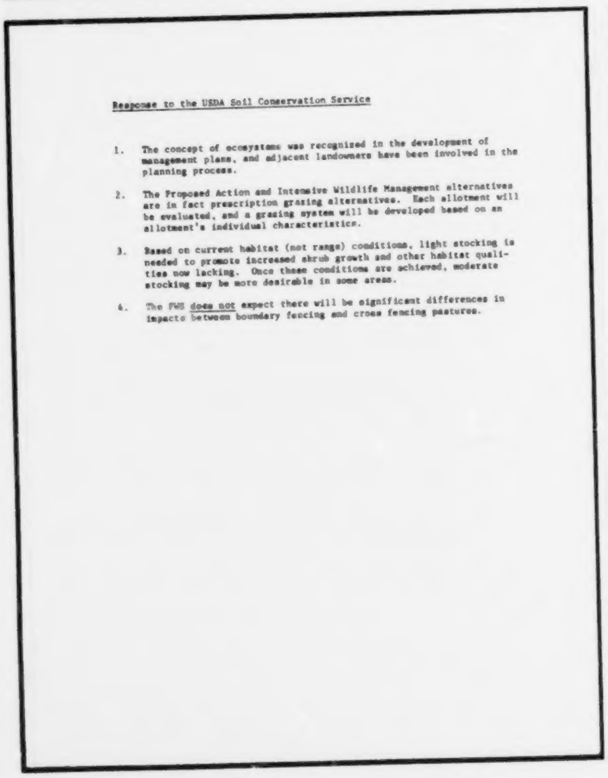
With the long irregular narrow land pattern of the refuge plus the fact the land is split by the Fort Peck Reservoir, it would be difficult in managing for wildlife maximums without increasing wildlife pressures on the private sector. 1

There should be another alternative including intensive management of the livestock use as a tool in improving the overall range condition and especially on excellent condition range. 2

The EIS indicates that light stocking is significantly better than moderate stocking of livestock for wildlife. This will vary as to range condition which is not discussed sufficiently in the EIS. 3

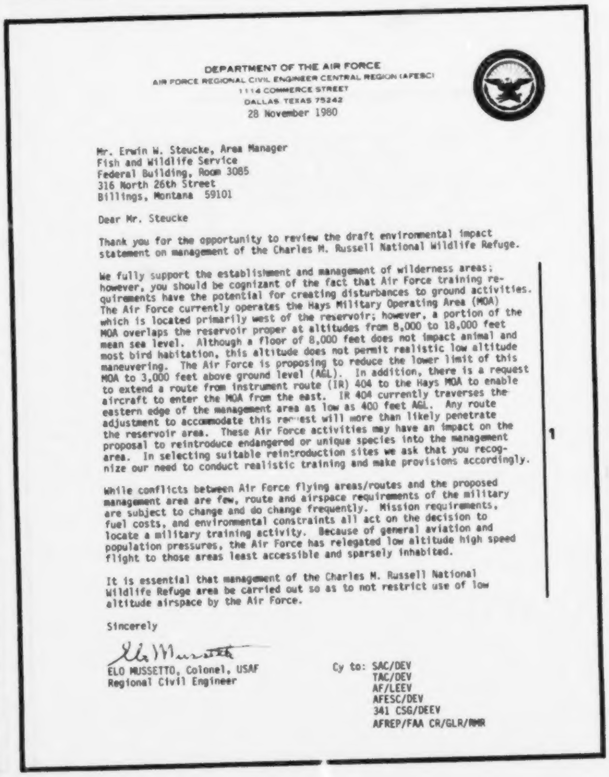
There is an indication of conflicting effects to fencing. Why should cross fences if properly designed have detrimental effects on some wildlife, yet if the refuge boundary is fenced there would be no significant detrimental impacts to wildlife expected. 4

Sam L. Short
Area Range Conservationist



Response to the USDA Soil Conservation Service

1. The concept of ecosystems was recognized in the development of management plans, and adjacent landowners have been involved in the planning process.
2. The Proposed Action and Intensive Wildlife Management alternatives are in fact prescription grazing alternatives. Each allotment will be evaluated, and a grazing system will be developed based on an allotment's individual characteristics.
3. Based on current habitat (not range) conditions, light stocking is needed to promote increased shrub growth and other habitat qualities now lacking. Once these conditions are achieved, moderate stocking may be more desirable in some areas.
4. The FWS does not expect there will be significant differences in impacts between boundary fencing and cross fencing pastures.



DEPARTMENT OF THE AIR FORCE
AIR FORCE REGIONAL CIVIL ENGINEER CENTRAL REGION (AFESC)
1114 COMMERCE STREET
DALLAS TEXAS 75242
28 November 1980

Mr. Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3085
316 North 26th Street
Billings, Montana 59101

Dear Mr. Steucke

Thank you for the opportunity to review the draft environmental impact statement on management of the Charles M. Russell National Wildlife Refuge.

We fully support the establishment and management of wilderness areas; however, you should be cognizant of the fact that Air Force training requirements have the potential for creating disturbances to ground activities. The Air Force currently operates the Hays Military Operating Area (MOA) which is located primarily west of the reservoir; however, a portion of the MOA overlaps the reservoir proper at altitudes from 8,000 to 18,000 feet mean sea level. Although a floor of 8,000 feet does not impact animal and most bird habitation, this altitude does not permit realistic low altitude maneuvering. The Air Force is proposing to reduce the lower limit of this MOA to 3,000 feet above ground level (AGL). In addition, there is a request to extend a route from instrument route (IR) 404 to the Hays MOA to enable aircraft to enter the MOA from the east. IR 404 currently traverses the eastern edge of the management area as low as 400 feet AGL. Any route adjustment to accommodate this request will more than likely penetrate the reservoir area. These Air Force activities may have an impact on the proposal to reintroduce endangered or unique species into the management area. In selecting suitable reintroduction sites we ask that you recognize our need to conduct realistic training and make provisions accordingly. 1

While conflicts between Air Force flying areas/routes and the proposed management area are few, route and airspace requirements of the military are subject to change and do change frequently. Mission requirements, fuel costs, and environmental constraints all act on the decision to locate a military training activity. Because of general aviation and population pressures, the Air Force has relegated low altitude high speed flight to those areas least accessible and sparsely inhabited.

It is essential that management of the Charles M. Russell National Wildlife Refuge area be carried out so as to not restrict use of low altitude airspace by the Air Force.

Sincerely

ELO MUSSETTO, Colonel, USAF
Regional Civil Engineer

Cy to: SAC/DEV
TAC/DEV
AF/LEEV
AFESC/DEV
341 CSG/DEEV
AFREP/FAA CR/GLR/RMR

Response to the Department of the Air Force

1. The FWS recognises the potential for creating ground disturbance from overflights in the Hays Military Operating Area. Ongoing and future management actions will take these factors into consideration. Any future conflicts will be addressed by the FWS and Air Force towards reaching mutually satisfactory arrangements.

DEPARTMENT OF THE ARMY
OMAHA DISTRICT CORPS OF ENGINEERS
6014 U S POST OFFICE AND COURTHOUSE
OMAHA NEBRASKA 68102

REPLY TO ATTENTION OF

MROPD-A

25 November 1980

Mr. Erwin W. Steucke
Area Manager
U.S. Fish and Wildlife Service
Room 3035, Federal Building
316 North 26th Avenue
Billings, MT 59101

Dear Mr. Steucke:

This office has reviewed the Draft Environmental Impact Statement (DEIS) on the management of the Charles M. Russell National Wildlife Refuge (CMR) in Montana. We are inclosing our comments for your consideration in development of the Final Environmental Impact Statement.

Thank you for giving us the opportunity to provide these comments, which we hope will be of assistance to you.

Sincerely,

fr Richard D. Gorton
ARVID L. THOMSEN
Acting Chief, Planning Division

1 Incl
As stated

General Comments:

We agree that Alternative B (Proposed Action) is the most desirable alternative and also acknowledge that there will be some social and economic obstacles to overcome in implementing this alternative. The other alternatives may not be implementable under existing Fish and Wildlife Service laws and policies.

We recognize that several constraints alter normal refuge management, however, we highly recommend the refuge be managed as a National Wildlife Refuge, to the greatest extent possible.

We recognize that good winter habitat is a critical element in the survival of wildlife in the Missouri River breaks country of eastern Montana and encourage you to consider a more extensive shrub and tree planting program than is recommended in Alternative B. We recommend plantings specifically in the valley draws, canyons and ponds which will support plant growth. Also, we recommend these areas be fenced to preclude damage by cattle. Our experience indicates that habitat damage by cattle is a far greater detriment to the naturalness of an area than is the fencing of critical habitat areas. This type of fencing insures the permanency of the habitat during winter and drought periods.

We also recommend that cooperative farming be implemented in areas where the visual naturalness is not interrupted. This will diversify the habitat, food source and therefore the wildlife.

The grazing of livestock should not be eliminated, but remain primarily as a habitat management tool.

Specific Comments:

Page 1, paragraph 2, Foreword. Further discussion in this paragraph may be warranted to clarify how Public Law 94-223 solved part of the management problem on CMR. The first sentence states that..."the conflicting legislation and mandates between the Corps of Engineers and the Fish and Wildlife Service remain." This wording should be deleted from the sentence since all jurisdictional questions between the two agencies have been resolved in a Memorandum of Agreement signed in July 1979. It is further recommended that this paragraph be rewritten as follows: 1

> "Passage of Public Law 94-223 in 1976 has solved part of this management problem. Also, a Memorandum of Agreement was signed by the Corps of Engineers and the U.S. Fish and Wildlife Service in July 1979. The agreement was signed to insure that both agencies coordinate all future planning activities on the Charles M. Russell National Wildlife Refuge."

Page x, paragraph 1, No Action Alternative. The last sentence states that "Recreational developments would remain essentially unchanged." This statement may conflict with planned recreation concepts and developments presently under consideration in the Corps of Engineers Master Plan for the Fort Peck Lake Project. It is recommended that this sentence be rewritten as follows: 2

> "Any changes in the status of recreational development would be accomplished in accordance with the Memorandum of Agreement of July 1979."

Page x, paragraph 5, Intensive Wildlife Management Alternative. The last sentence states that "...COE-FWS legislative conflicts would have to be resolved in favor of FWS." These conflicts have been resolved by the Memorandum of Agreement signed in July 1979 by the two agencies and thus the wording quoted above should be deleted from the sentence. 3

Page xi, paragraph 4, Intensive Wildlife Management Alternative. The second sentence states that "Private cabins would be eliminated and the areas returned to wildlife habitat." This statement is not consistent with the Memorandum of Agreement signed by the Corps and FWS in July 1979, nor is the statement consistent with past interagency discussions. It is recommended that this sentence be deleted from the paragraph. 4

Page 1, last sentence. The last sentence should be rewritten as follows: 5

> "The COE held public meetings also at Glasgow, Lewistown, Glendive and Jordan in June 1979."

Pages 4, 5, and 6. We agree with the CMR goals, wildlife objectives and range objectives.

Page 5, Wildlife Objectives. On page x it states that the "...swift fox would be reintroduced as they become available." There is no mention of this species under wildlife objectives. 6

Page 9, paragraph 3, General. The first two sentences state that "Clarification of conflicting legislation and management responsibilities between COE and FWS would be sought. A cooperative effort with COE would be launched to determine ownership of all lands within the CMR boundary." These two sentences, along with the rest of the paragraph should be deleted since the above issues are presently being coordinated according to Memorandum of Agreement signed in July 1979. 7

Page 13, last paragraph. This paragraph states that "FWS would work with the COE in recommending operation of the Fort Peck Dam and Reservoir in a manner which would tend to limit water level fluctuations to enhance recreation and fisheries opportunities..." The Corps of Engineers acknowledges the importance of water level fluctuations in fisheries management and recreation. The Corps will work with the FWS and coordinate the missions of FLOOD CONTROL, NAVIGATION, IRRIGATION AND POWER GENERATION, with fisheries management and recreation when possible. 8

Page 15, Figure 1. The following recreation areas should be shown on the map: Reynolds Hill Road Recreation Area (future); the Pines Recreation Area; and the Flat Lake Recreation Area. 9

Page 16, Mitigating Measures. Suggest constraints be softened to allow for mitigating measures. These would include fencing, construction of stock ponds and other management facilities, etc. where the visual naturalness would not be impaired. This would retain a natural and/or rustic setting on the refuge. 10

Page 17, last sentence. This sentence states that "If recreation activities result in significant conflicts with wildlife, actions would be taken as necessary to solve the problem." This type of an issue will be dealt with under the terms of the Memorandum of Agreement signed by the two agencies in July 1979, thus the sentence is inappropriate in this document. 11

Page 18, paragraph 1. This paragraph contains two specific statements recommending the removal of private cabins. These statements are not consistent with the Memorandum of Agreement signed by the Corps and FWS in July 1979, nor are they consistent with past interagency discussions. It is recommended that these statements be deleted from the paragraph. The third sentence states that "The legislative conflicts between COE and FWS would have to be resolved...". This sentence implies that additional legislation would be proposed to clarify past jurisdictional issues. Since all jurisdictional issues have been resolved by the Corps of Engineers and the U.S. Fish and Wildlife Service in the Memorandum of Agreement signed in July 1979, it is recommended that the entire sentence be deleted from the paragraph. 12

Page 26, paragraph 3, last sentence. This sentence states that "Removal of private cabins would require that the FWS-COE legislative conflicts be resolved in favor of FWS." This sentence is not consistent with the Memorandum of Agreement signed by the Corps and FWS in July 1979, nor is the sentence consistent with past interagency discussions. It is recommended that this sentence be deleted from the paragraph. 13

Page 54, Figure 8. The following existing recreation areas should be shown on the map: The Pines Recreation Area and the Flat Lake Recreation Area. 14

Summary Comments:

Regardless of the management alternative finally selected for implementation on CMR, the Corps of Engineers will continue to coordinate with the FWS to insure that all Federal lands within the CMR boundary are managed in the public's best interest.

3

Response to the U.S. Army Corps of Engineers

1. The foreword has been rewritten.
2. FWS agrees; the text has been amended.
3. The text has been amended.
4. This action is not proposed but is an alternative. Management conflicts of this type would be cooperatively resolved within the terms of the Memorandum of Agreement between the Corps of Engineers and the FWS.
5. The text has been amended.
6. The text has been amended.
7. The text has been amended.
8. The text has been amended.
9. The map has been revised.
10. The decision to manage in a "generally natural setting" is in accordance with FWS legislative mandates and policies. In examination of HEP values compiled on allotments, it has been concluded that additional water development would be detrimental to most wildlife species by distributing livestock into areas now needed and used almost exclusively by wildlife. Situations will, however, be evaluated on a case-by-case basis.
11. The text has been amended.
12. The text has been amended.
13. The text has been amended.
14. The map has been revised.

UNITED STATES DEPARTMENT OF COMMERCE
The Assistant Secretary for Policy
Washington, D.C. 20230

NOV 17 1980

Mr. Erwin W. Steucke, Area Manager
Fish and Wildlife Service
U.S. Department of the Interior
Federal Building, Room 3035
3 6 North 26th Street
Billings, Montana 59101

Dear Mr. Steucke:

This is in reference to your draft environmental impact statement entitled, "Management of Charles M. Russell National Wildlife Refuge, Montana." The enclosed comment from the National Oceanic and Atmospheric Administration (NOAA) is forwarded for your consideration.

Thank you for giving us an opportunity to provide this comment, which we hope will be of assistance to you. We would appreciate receiving six copies of the final statement.

Sincerely,

Robert T. Miki

Robert T. Miki
Deputy Assistant Secretary for
  Regulatory Policy (Acting)

Enclosure Memo from Mr. Kenneth Hadeen
  Environmental Data and
  Information Service, NOAA

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
ENVIRONMENTAL DATA AND INFORMATION SERVICE
Washington, D.C. 20235

Rec'd PP/EC
OCT 0 3 1980

Center for Environmental Assessment Services

October 2, 1980 D242:MR

TO: PP/EC - Joyce Wood

FROM: OA/D2x1 - Kenneth Hadeen

SUBJECT: DEIS 8009.20 - Management of Charles M. Russell National Wildlife Refuge--Montana

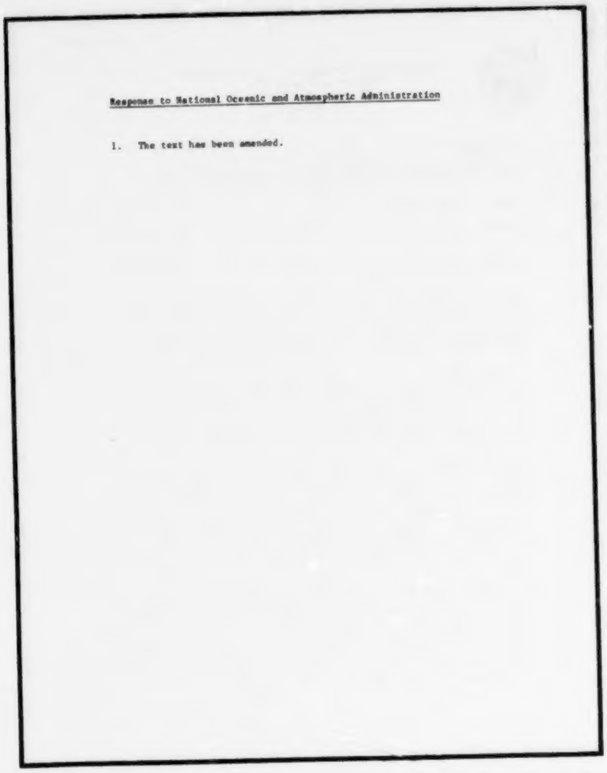
General Comments: None.

Specific Comments (See page 33 under Climate Section)

The DEIS states that winters are bitterly cold (-34°F to -50°F) and summers are hot (100°F+). The DEIS would be more precise if it stated that winters are moderately cold (average January minimums are near 0°F). Occasionally, bitterly cold periods with temperatures of -20°F or lower are experienced, and the lowest on record is -58°F. Summers are what most people would consider pleasant, with low humidity and afternoon readings in the middle 80's and morning minimums in the middle 50's. Occasionally, periods of 100°F temperatures are experienced, with an extreme of 112°F being the highest on record. 1

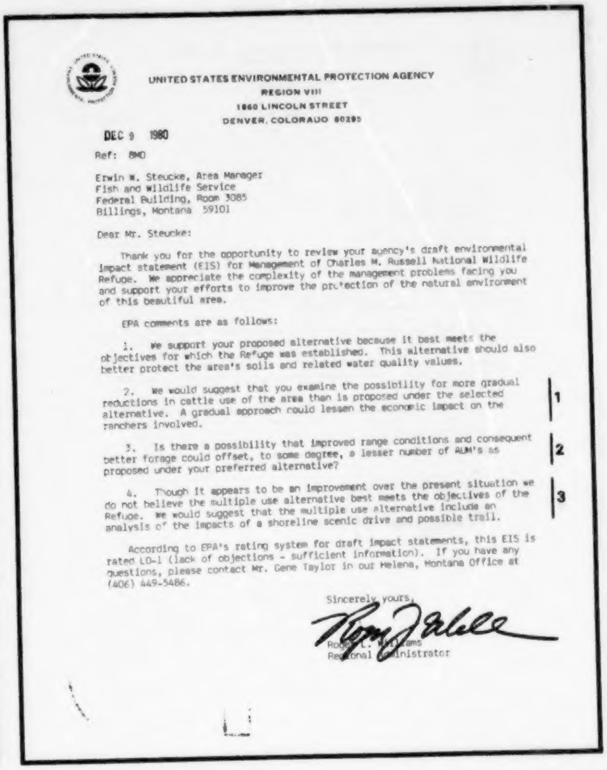
(RF: D242, R. Leffler)

10TH ANNIVERSARY 1970-1980
National Oceanic and Atmospheric Administration
A young agency with a historic tradition of service to the Nation



Response to National Oceanic and Atmospheric Administration

1. The text has been amended.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
1860 LINCOLN STREET
DENVER, COLORADO 80295

DEC 9 1980

Ref: 8MO

Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3085
Billings, Montana 59101

Dear Mr. Steucke:

Thank you for the opportunity to review your agency's draft environmental impact statement (EIS) for Management of Charles M. Russell National Wildlife Refuge. We appreciate the complexity of the management problems facing you and support your efforts to improve the protection of the natural environment of this beautiful area.

EPA comments are as follows:

1. We support your proposed alternative because it best meets the objectives for which the Refuge was established. This alternative should also better protect the area's soils and related water quality values.

2. We would suggest that you examine the possibility for more gradual reductions in cattle use of the area than is proposed under the selected alternative. A gradual approach could lessen the economic impact on the ranchers involved. 1

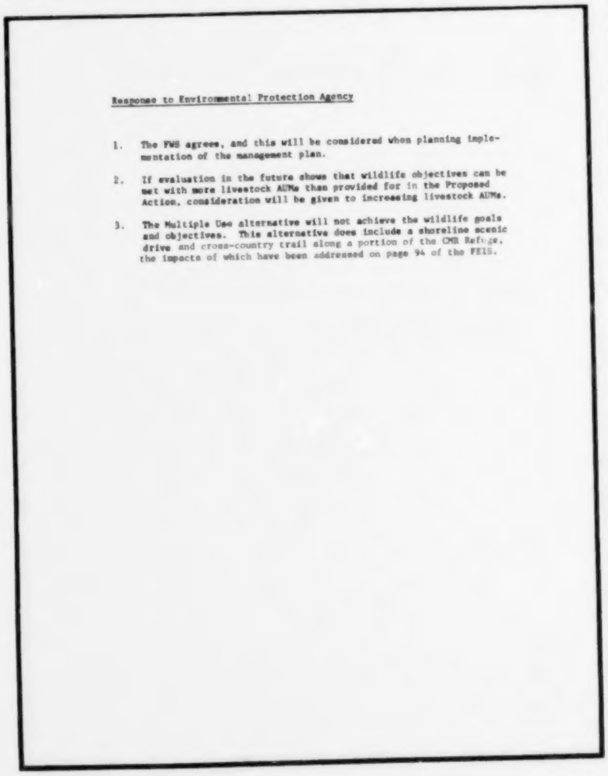
3. Is there a possibility that improved range conditions and consequent better forage could offset, to some degree, a lesser number of AUM's as proposed under your preferred alternative? 2

4. Though it appears to be an improvement over the present situation we do not believe the multiple use alternative best meets the objectives of the Refuge. We would suggest that the multiple use alternative include an analysis of the impacts of a shoreline scenic drive and possible trail. 3

According to EPA's rating system for draft impact statements, this EIS is rated LO-1 (lack of objections - sufficient information). If you have any questions, please contact Mr. Gene Taylor in our Helena, Montana Office at (406) 449-5486.

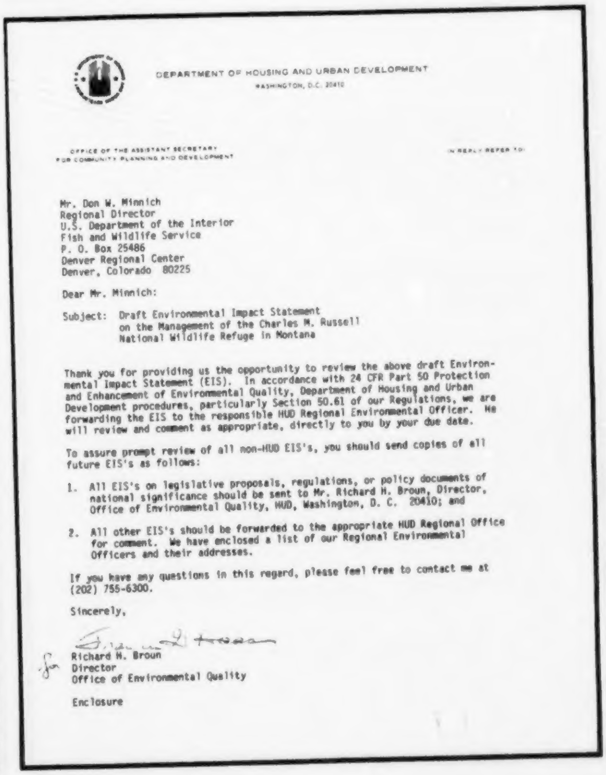
Sincerely yours,

Roger L. Williams
Regional Administrator



Response to Environmental Protection Agency

1. The FWS agrees, and this will be considered when planning implementation of the management plan.
2. If evaluation in the future shows that wildlife objectives can be met with more livestock AUMs than provided for in the Proposed Action, consideration will be given to increasing livestock AUMs.
3. The Multiple Use alternative will not achieve the wildlife goals and objectives. This alternative does include a shoreline scenic drive and cross-country trail along a portion of the CMR Refuge, the impacts of which have been addressed on page 94 of the FEIS.



DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, D.C. 20410

OFFICE OF THE ASSISTANT SECRETARY
FOR COMMUNITY PLANNING AND DEVELOPMENT

IN REPLY REFER TO:

Mr. Don W. Minnich
Regional Director
U.S. Department of the Interior
Fish and Wildlife Service
P. O. Box 25486
Denver Regional Center
Denver, Colorado 80225

Dear Mr. Minnich:

Subject: Draft Environmental Impact Statement
on the Management of the Charles M. Russell
National Wildlife Refuge in Montana

Thank you for providing us the opportunity to review the above draft Environmental Impact Statement (EIS). In accordance with 24 CFR Part 50 Protection and Enhancement of Environmental Quality, Department of Housing and Urban Development procedures, particularly Section 50.61 of our Regulations, we are forwarding the EIS to the responsible HUD Regional Environmental Officer. He will review and comment as appropriate, directly to you by your due date.

To assure prompt review of all non-HUD EIS's, you should send copies of all future EIS's as follows:

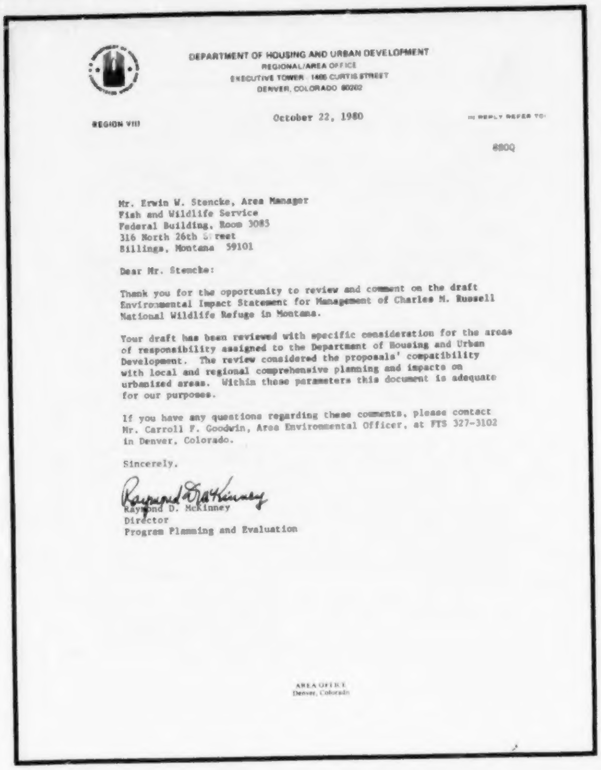
1. All EIS's on legislative proposals, regulations, or policy documents of national significance should be sent to Mr. Richard H. Broun, Director, Office of Environmental Quality, HUD, Washington, D. C. 20410; and
2. All other EIS's should be forwarded to the appropriate HUD Regional Office for comment. We have enclosed a list of our Regional Environmental Officers and their addresses.

If you have any questions in this regard, please feel free to contact me at (202) 755-6300.

Sincerely,

for
Richard H. Broun
Director
Office of Environmental Quality

Enclosure



DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
REGIONAL/AREA OFFICE
EXECUTIVE TOWER · 1405 CURTIS STREET
DENVER, COLORADO 80202

REGION VIII

October 22, 1980

IN REPLY REFER TO:

8BOQ

Mr. Erwin W. Stencke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3085
316 North 26th Street
Billings, Montana 59101

Dear Mr. Stencke:

Thank you for the opportunity to review and comment on the draft Environmental Impact Statement for Management of Charles M. Russell National Wildlife Refuge in Montana.

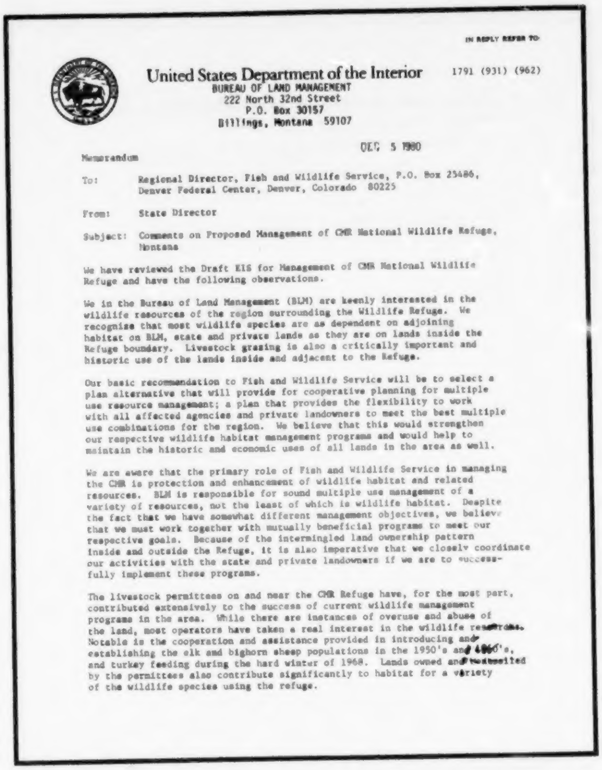
Your draft has been reviewed with specific consideration for the areas of responsibility assigned to the Department of Housing and Urban Development. The review considered the proposals' compatibility with local and regional comprehensive planning and impacts on urbanized areas. Within these parameters this document is adequate for our purposes.

If you have any questions regarding these comments, please contact Mr. Carroll F. Goodwin, Area Environmental Officer, at FTS 327-3102 in Denver, Colorado.

Sincerely,

Raymond D. McKinney
Raymond D. McKinney
Director
Program Planning and Evaluation

AREA OFFICE
Denver, Colorado



IN REPLY REFER TO:

United States Department of the Interior
BUREAU OF LAND MANAGEMENT
222 North 32nd Street
P.O. Box 30157
Billings, Montana 59107

1791 (931) (962)

DEC 5 1980

Memorandum

To: Regional Director, Fish and Wildlife Service, P.O. Box 25486, Denver Federal Center, Denver, Colorado 80225

From: State Director

Subject: Comments on Proposed Management of CMR National Wildlife Refuge, Montana

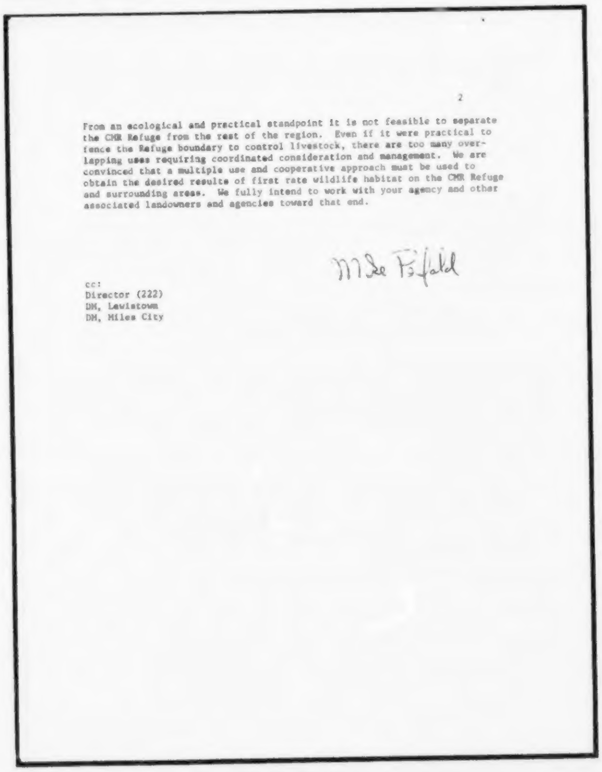
We have reviewed the Draft EIS for Management of CMR National Wildlife Refuge and have the following observations.

We in the Bureau of Land Management (BLM) are keenly interested in the wildlife resources of the region surrounding the Wildlife Refuge. We recognize that most wildlife species are as dependent on adjoining habitat on BLM, state and private lands as they are on lands inside the Refuge boundary. Livestock grazing is also a critically important and historic use of the lands inside and adjacent to the Refuge.

Our basic recommendation to Fish and Wildlife Service will be to select a plan alternative that will provide for cooperative planning for multiple use resource management; a plan that provides the flexibility to work with all affected agencies and private landowners to meet the best multiple use combinations for the region. We believe that this would strengthen our respective wildlife habitat management programs and would help to maintain the historic and economic uses of all lands in the area as well.

We are aware that the primary role of Fish and Wildlife Service in managing the CMR is protection and enhancement of wildlife habitat and related resources. BLM is responsible for sound multiple use management of a variety of resources, not the least of which is wildlife habitat. Despite the fact that we have somewhat different management objectives, we believe that we must work together with mutually beneficial programs to meet our respective goals. Because of the intermingled land ownership pattern inside and outside the Refuge, it is also imperative that we closely coordinate our activities with the state and private landowners if we are to successfully implement these programs.

The livestock permittees on and near the CMR Refuge have, for the most part, contributed extensively to the success of current wildlife management programs in the area. While there are instances of overuse and abuse of the land, most operators have taken a real interest in the wildlife resources. Notable is the cooperation and assistance provided in introducing and establishing the elk and bighorn sheep populations in the 1950's and 1960's, and turkey feeding during the hard winter of 1968. Lands owned and [illegible] by the permittees also contribute significantly to habitat for a variety of the wildlife species using the refuge.

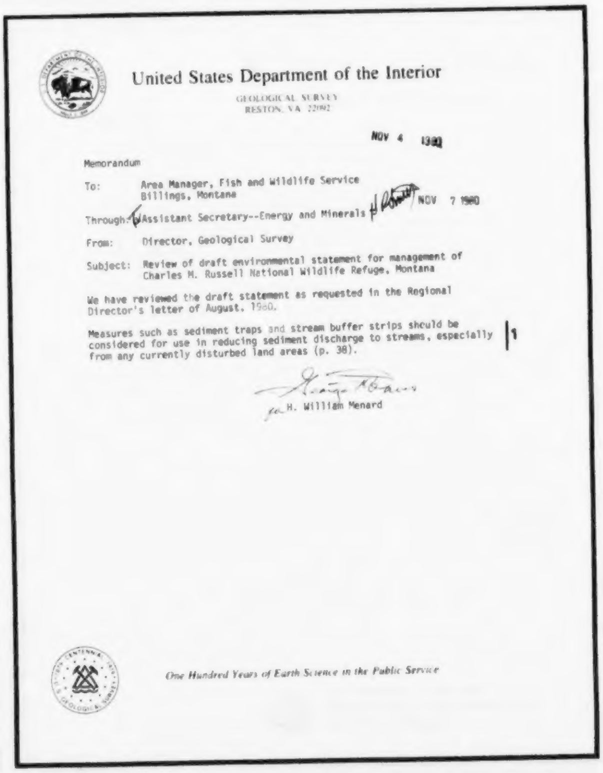


2

From an ecological and practical standpoint it is not feasible to separate the CMR Refuge from the rest of the region. Even if it were practical to fence the Refuge boundary to control livestock, there are too many overlapping uses requiring coordinated consideration and management. We are convinced that a multiple use and cooperative approach must be used to obtain the desired results of first rate wildlife habitat on the CMR Refuge and surrounding areas. We fully intend to work with your agency and other associated landowners and agencies toward that end.

Mike Penfold

cc:
Director (222)
DM, Lewistown
DM, Miles City



United States Department of the Interior
GEOLOGICAL SURVEY
RESTON, VA 22092

NOV 4 1980

Memorandum

To: Area Manager, Fish and Wildlife Service
Billings, Montana

Through: Assistant Secretary--Energy and Minerals NOV 7 1980

From: Director, Geological Survey

Subject: Review of draft environmental statement for management of Charles M. Russell National Wildlife Refuge, Montana

We have reviewed the draft statement as requested in the Regional Director's letter of August, 1980.

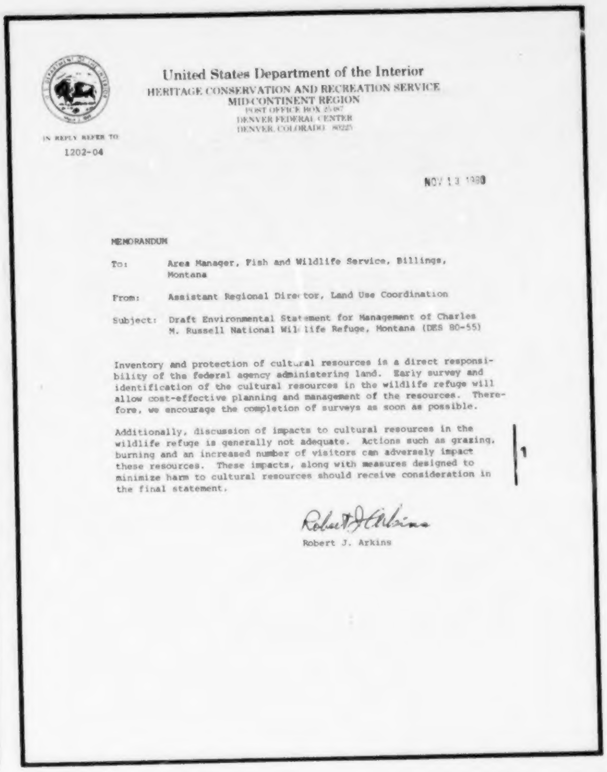
Measures such as sediment traps and stream buffer strips should be considered for use in reducing sediment discharge to streams, especially from any currently disturbed land areas (p. 38). 1

H. William Menard

One Hundred Years of Earth Science in the Public Service

Response to U.S. Geological Survey

1. While sediment traps and stream buffer strips are methods of reducing sediment discharge, road modification to avoid areas of excessive erosion due to rutting is also a workable method. The FWS will evaluate each situation and utilize the best one for each area.



United States Department of the Interior
HERITAGE CONSERVATION AND RECREATION SERVICE
MID-CONTINENT REGION
POST OFFICE BOX 25387
DENVER FEDERAL CENTER
DENVER, COLORADO 80225

IN REPLY REFER TO:
1202-04

NOV 13 1980

MEMORANDUM

To: Area Manager, Fish and Wildlife Service, Billings, Montana

From: Assistant Regional Director, Land Use Coordination

Subject: Draft Environmental Statement for Management of Charles M. Russell National Wildlife Refuge, Montana (DES 80-55)

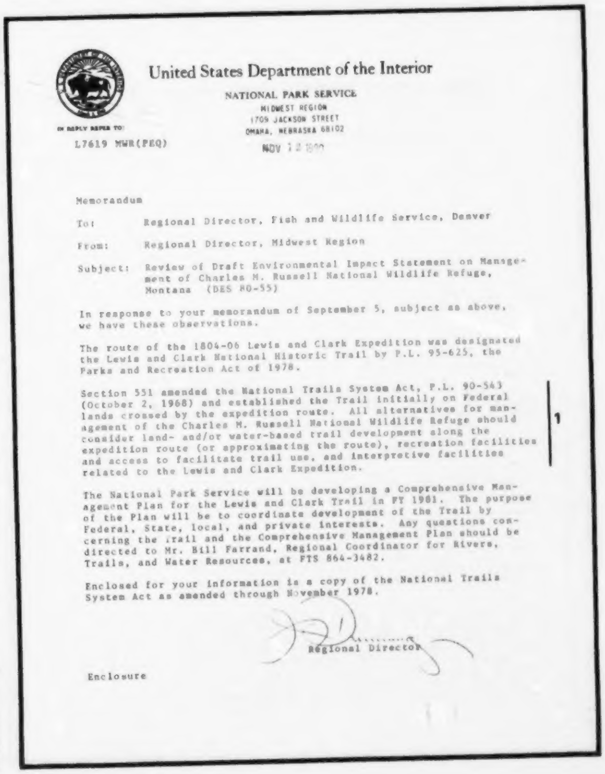
Inventory and protection of cultural resources is a direct responsibility of the federal agency administering land. Early survey and identification of the cultural resources in the wildlife refuge will allow cost-effective planning and management of the resources. Therefore, we encourage the completion of surveys as soon as possible.

Additionally, discussion of impacts to cultural resources in the wildlife refuge is generally not adequate. Actions such as grazing, burning and an increased number of visitors can adversely impact these resources. These impacts, along with measures designed to minimize harm to cultural resources should receive consideration in the final statement. 1

Robert J. Arkins
Robert J. Arkins

Response to Heritage Conservation and Recreation Service

1. The FWS will comply with all pertinent legislation concerning the identification and protection of cultural resources. No significant impacts on cultural resources are anticipated by the proposed action. Also, please refer to page 3, paragraph 2, and Recreation Objective number 1 on page 6 in the text. In addition, impacts to cultural resources are discussed throughout the text in the Consequences Section.



United States Department of the Interior
NATIONAL PARK SERVICE
MIDWEST REGION
1709 JACKSON STREET
OMAHA, NEBRASKA 68102

IN REPLY REFER TO:
L7619 MWR(PEQ)

NOV 12 1980

Memorandum

To: Regional Director, Fish and Wildlife Service, Denver

From: Regional Director, Midwest Region

Subject: Review of Draft Environmental Impact Statement on Management of Charles M. Russell National Wildlife Refuge, Montana (DES 80-55)

In response to your memorandum of September 5, subject as above, we have these observations.

The route of the 1804-06 Lewis and Clark Expedition was designated the Lewis and Clark National Historic Trail by P.L. 95-625, the Parks and Recreation Act of 1978.

Section 551 amended the National Trails System Act, P.L. 90-543 (October 2, 1968) and established the Trail initially on Federal lands crossed by the expedition route. All alternatives for management of the Charles M. Russell National Wildlife Refuge should consider land- and/or water-based trail development along the expedition route (or approximating the route), recreation facilities and access to facilitate trail use, and interpretive facilities related to the Lewis and Clark Expedition. 1

The National Park Service will be developing a Comprehensive Management Plan for the Lewis and Clark Trail in FY 1981. The purpose of the Plan will be to coordinate development of the Trail by Federal, State, local, and private interests. Any questions concerning the Trail and the Comprehensive Management Plan should be directed to Mr. Bill Farrand, Regional Coordinator for Rivers, Trails, and Water Resources, at FTS 864-3482.

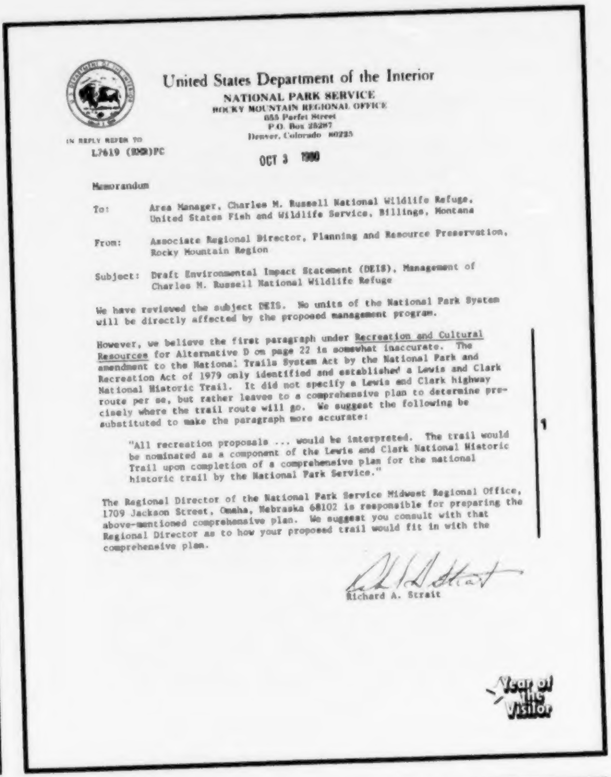
Enclosed for your information is a copy of the National Trails System Act as amended through November 1978.

Regional Director

Enclosure

Response to National Park Service, Midwest Region

1. Recreation and interpretation related to cultural resources were evaluated for inclusion in various alternatives based on their compatibility with wildlife objectives. Many of the ones included in the alternatives relate to the Lewis and Clark Expedition.



United States Department of the Interior
NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE
655 Parfet Street
P.O. Box 25287
Denver, Colorado 80225

IN REPLY REFER TO
L7619 (RMR)PC

OCT 3 1980

Memorandum

To: Area Manager, Charles M. Russell National Wildlife Refuge, United States Fish and Wildlife Service, Billings, Montana

From: Associate Regional Director, Planning and Resource Preservation, Rocky Mountain Region

Subject: Draft Environmental Impact Statement (DEIS), Management of Charles M. Russell National Wildlife Refuge

We have reviewed the subject DEIS. No units of the National Park System will be directly affected by the proposed management program.

However, we believe the first paragraph under Recreation and Cultural Resources for Alternative D on page 22 is somewhat inaccurate. The amendment to the National Trails System Act by the National Park and Recreation Act of 1979 only identified and established a Lewis and Clark National Historic Trail. It did not specify a Lewis and Clark highway route per se, but rather leaves to a comprehensive plan to determine precisely where the trail route will go. We suggest the following be substituted to make the paragraph more accurate: 1

> "All recreation proposals ... would be interpreted. The trail would be nominated as a component of the Lewis and Clark National Historic Trail upon completion of a comprehensive plan for the national historic trail by the National Park Service."

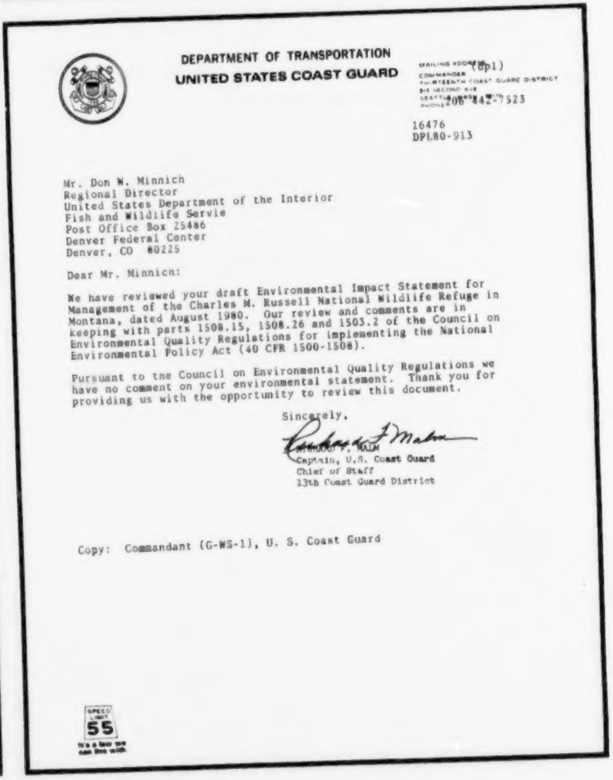
The Regional Director of the National Park Service Midwest Regional Office, 1709 Jackson Street, Omaha, Nebraska 68102 is responsible for preparing the above-mentioned comprehensive plan. We suggest you consult with that Regional Director as to how your proposed trail would fit in with the comprehensive plan.

Richard A. Strait

Year of the Visitor

Response to National Park Service, Rocky Mountain Region

1. The text has been amended. The FWS will coordinate the Lewis and Clark National Historic Trail with all agencies involved.



DEPARTMENT OF TRANSPORTATION
UNITED STATES COAST GUARD

MAILING ADDRESS: (dpl)
COMMANDER
THIRTEENTH COAST GUARD DISTRICT
915 SECOND AVE
SEATTLE, WASH. 98174
PHONE: 206 442-7523

16476
DPL80-913

Mr. Don W. Minnich
Regional Director
United States Department of the Interior
Fish and Wildlife Servie
Post Office Box 25486
Denver Federal Center
Denver, CO 80225

Dear Mr. Minnicn:

We have reviewed your draft Environmental Impact Statement for Management of the Charles M. Russell National Wildlife Refuge in Montana, dated August 1980. Our review and comments are in keeping with parts 1508.15, 1508.26 and 1503.2 of the Council on Environmental Quality Regulations for implementing the National Environmental Policy Act (40 CFR 1500-1508).

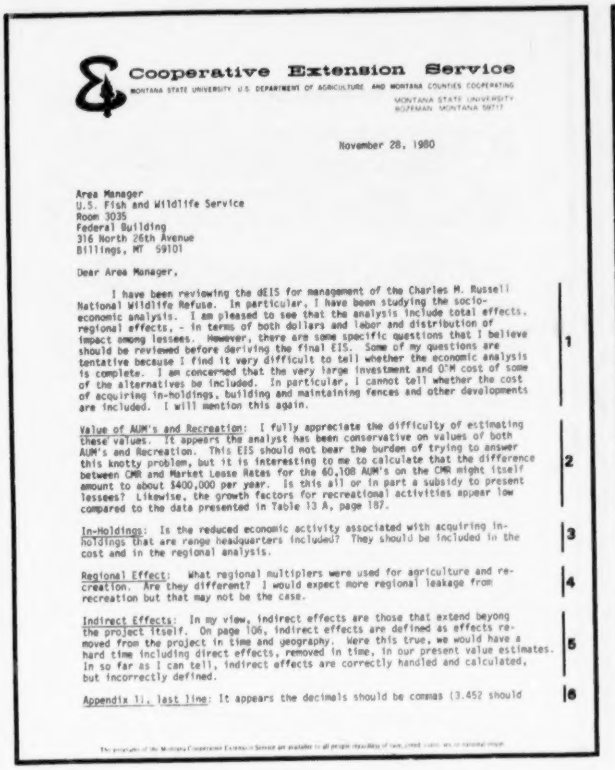
Pursuant to the Council on Environmental Quality Regulations we have no comment on your environmental statement. Thank you for providing us with the opportunity to review this document.

Sincerely,

Richard F. Malm
RICHARD F. MALM
Captain, U.S. Coast Guard
Chief of Staff
13th Coast Guard District

Copy: Commandant (G-WS-1), U. S. Coast Guard

SPEED LIMIT 55



Cooperative Extension Service
MONTANA STATE UNIVERSITY U.S. DEPARTMENT OF AGRICULTURE AND MONTANA COUNTIES COOPERATING
MONTANA STATE UNIVERSITY
BOZEMAN MONTANA 59717

November 28, 1980

Area Manager
U.S. Fish and Wildlife Service
Room 3035
Federal Building
316 North 26th Avenue
Billings, MT 59101

Dear Area Manager,

I have been reviewing the dEIS for management of the Charles M. Russell National Wildlife Refuse. In particular, I have been studying the socio-economic analysis. I am pleased to see that the analysis include total effects, regional effects, - in terms of both dollars and labor and distribution of impact among lessees. However, there are some specific questions that I believe should be reviewed before deriving the final EIS. Some of my questions are tentative because I find it very difficult to tell whether the economic analysis is complete. I am concerned that the very large investment and O"M cost of some of the alternatives be included. In particular, I cannot tell whether the cost of acquiring in-holdings, building and maintaining fences and other developments are included. I will mention this again. 1

Value of AUM's and Recreation: I fully appreciate the difficulty of estimating these values. It appears the analyst has been conservative on values of both AUM's and Recreation. This EIS should not bear the burden of trying to answer this knotty problem, but it is interesting to me to calculate that the difference between CMR and Market Lease Rates for the 60,108 AUM's on the CMR might itself amount to about $400,000 per year. Is this all or in part a subsidy to present lessees? Likewise, the growth factors for recreational activities appear low compared to the data presented in Table 13 A, page 187. 2

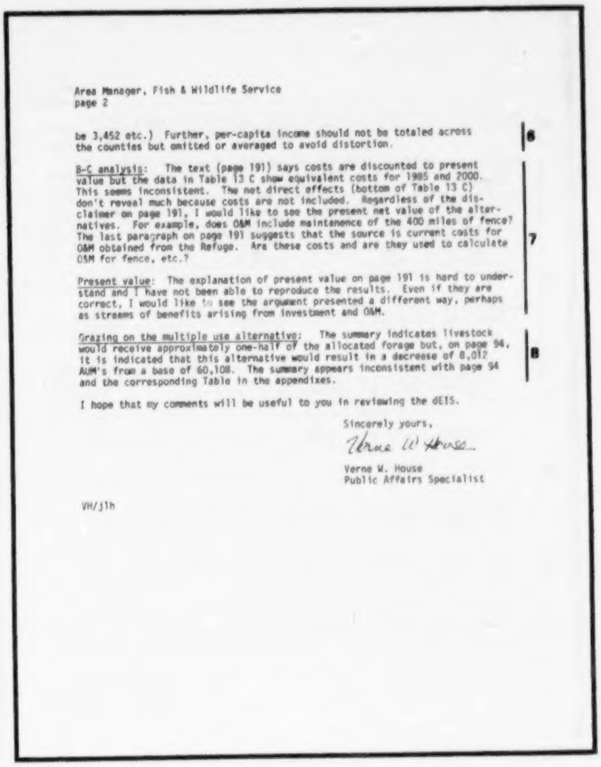
In-Holdings: Is the reduced economic activity associated with acquiring in-holdings that are range headquarters included? They should be included in the cost and in the regional analysis. 3

Regional Effect: What regional multiplers were used for agriculture and recreation. Are they different? I would expect more regional leakage from recreation but that may not be the case. 4

Indirect Effects: In my view, indirect effects are those that extend beyong the project itself. On page 106, indirect effects are defined as effects removed from the project in time and geography. Were this true, we would have a hard time including direct effects, removed in time, in our present value estimates. In so far as I can tell, indirect effects are correctly handled and calculated, but incorrectly defined. 5

Appendix 11, last line: It appears the decimals should be commas (3.452 should 6

The programs of the Montana Cooperative Extension Service are available to all people regardless of race, creed, color, sex or national origin.



Area Manager, Fish & Wildlife Service
page 2

be 3,452 etc.) Further, per-capita income should not be totaled across the counties but omitted or averaged to avoid distortion. 6

B-C analysis: The text (page 191) says costs are discounted to present value but the data in Table 13 C show equivalent costs for 1985 and 2000. This seems inconsistent. The net direct effects (bottom of Table 13 C) don't reveal much because costs are not included. Regardless of the disclaimer on page 191, I would like to see the present net value of the alternatives. For example, does O&M include maintanence of the 400 miles of fence? The last paragraph on page 191 suggests that the source is current costs for O&M obtained from the Refuge. Are these costs and are they used to calculate O&M for fence, etc.? 7

Present value: The explanation of present value on page 191 is hard to understand and I have not been able to reproduce the results. Even if they are correct, I would like to see the argument presented a different way, perhaps as streams of benefits arising from investment and O&M.

Grazing on the multiple use alternative: The summary indicates livestock would receive approximately one-half of the allocated forage but, on page 94, it is indicated that this alternative would result in a decrease of 8,012 AUM's from a base of 60,108. The summary appears inconsistent with page 94 and the corresponding Table in the appendixes. 8

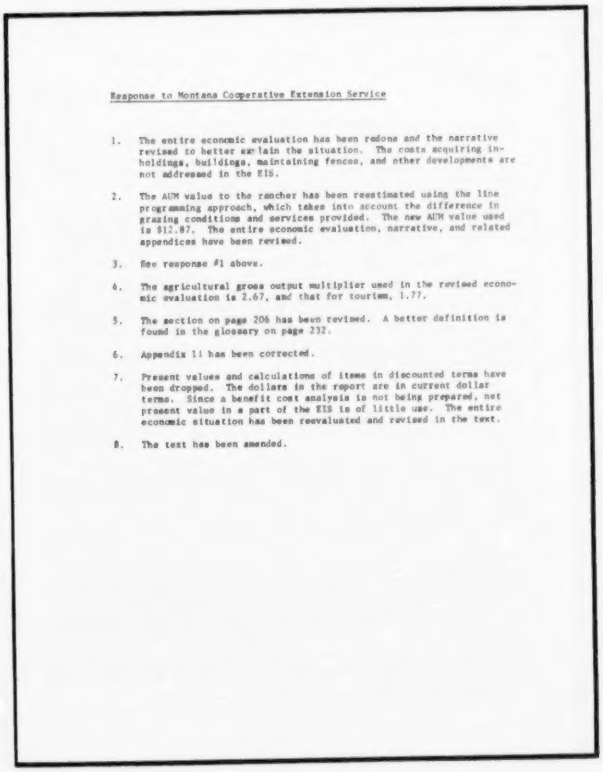
I hope that my comments will be useful to you in reviewing the dEIS.

Sincerely yours,

Verne W. House

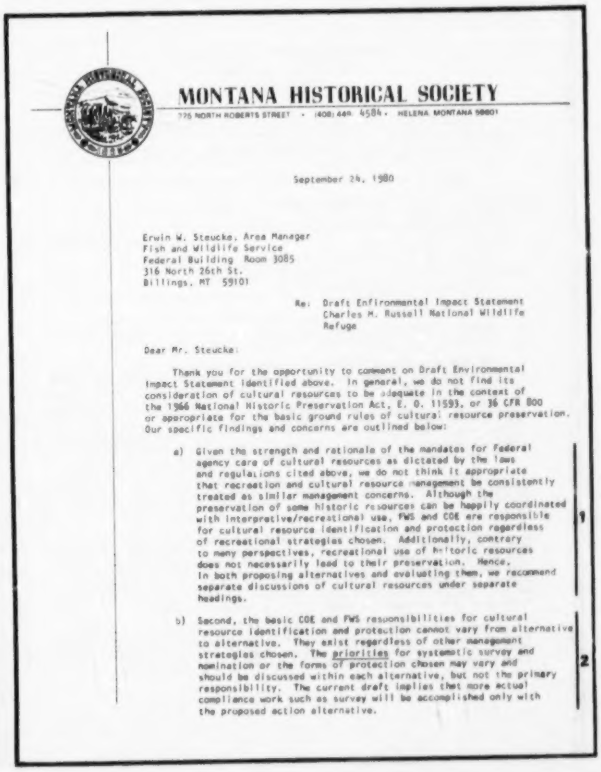
Verne W. House
Public Affairs Specialist

VH/jlh



Response to Montana Cooperative Extension Service

1. The entire economic evaluation has been redone and the narrative revised to better explain the situation. The costs acquiring in-holdings, buildings, maintaining fences, and other developments are not addressed in the EIS.
2. The AUM value to the rancher has been reestimated using the line programming approach, which takes into account the difference in grazing conditions and services provided. The new AUM value used is $12.87. The entire economic evaluation, narrative, and related appendices have been revised.
3. See response #1 above.
4. The agricultural gross output multiplier used in the revised economic evaluation is 2.67, and that for tourism, 1.77.
5. The section on page 206 has been revised. A better definition is found in the glossary on page 232.
6. Appendix 11 has been corrected.
7. Present values and calculations of items in discounted terms have been dropped. The dollars in the report are in current dollar terms. Since a benefit cost analysis is not being prepared, net present value in a part of the EIS is of little use. The entire economic situation has been reevaluated and revised in the text.
8. The text has been amended.



MONTANA HISTORICAL SOCIETY
225 NORTH ROBERTS STREET • (406) 449-4584 • HELENA MONTANA 59601

September 24, 1980

Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building Room 3085
316 North 26th St.
Billings, MT 59101

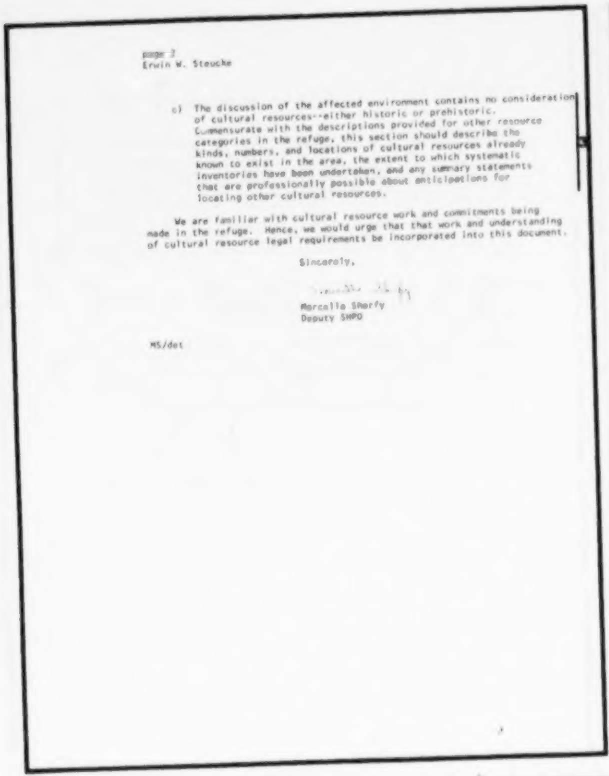
Re: Draft Enfironmental Impact Statement
Charles M. Russell National Wildlife
Refuge

Dear Mr. Steucke:

Thank you for the opportunity to comment on Draft Environmental Impact Statement identified above. In general, we do not find its consideration of cultural resources to be adequate in the context of the 1966 National Historic Preservation Act, E. O. 11593, or 36 CFR 800 or appropriate for the basic ground rules of cultural resource preservation. Our specific findings and concerns are outlined below:

a) Given the strength and rationale of the mandates for Federal agency care of cultural resources as dictated by the laws and regulations cited above, we do not think it appropriate that recreation and cultural resource management be consistently treated as similar management concerns. Although the preservation of some historic resources can be happily coordinated with interpretive/recreational use, FWS and COE are responsible for cultural resource identification and protection regardless of recreational strategies chosen. Additionally, contrary to many perspectives, recreational use of historic resources does not necessarily lead to their preservation. Hence, in both proposing alternatives and evaluating them, we recommend separate discussions of cultural resources under separate headings. 1

b) Second, the basic COE and FWS responsibilities for cultural resource identification and protection cannot vary from alternative to alternative. They exist regardless of other management strategies chosen. The priorities for systematic survey and nomination or the forms of protection chosen may vary and should be discussed within each alternative, but not the primary responsibility. The current draft implies that more actual compliance work such as survey will be accomplished only with the proposed action alternative. 2



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Erwin W. Steucke

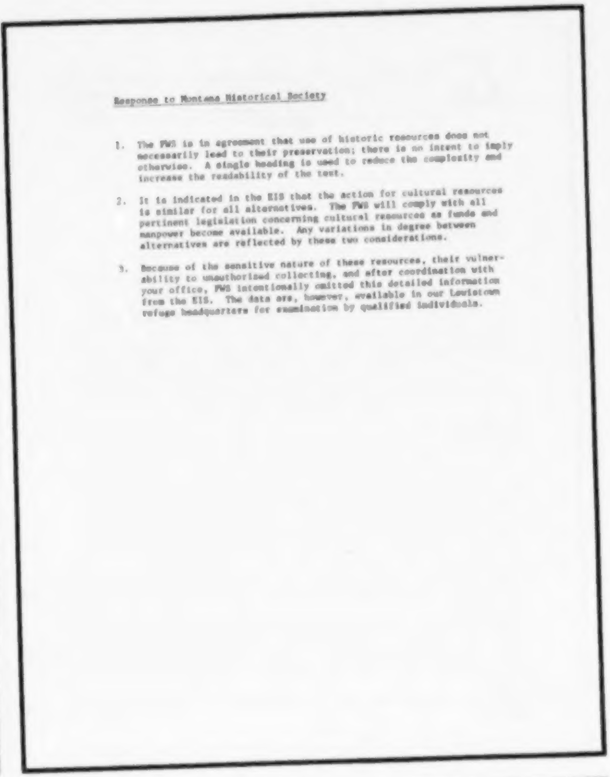
c) The discussion of the affected environment contains no consideration of cultural resources--either historic or prehistoric. Commensurate with the descriptions provided for other resource categories in the refuge, this section should describe the kinds, numbers, and locations of cultural resources already known to exist in the area, the extent to which systematic inventories have been undertaken, and any summary statements that are professionally possible about anticipations for locating other cultural resources. 5

We are familiar with cultural resource work and commitments being made in the refuge. Hence, we would urge that that work and understanding of cultural resource legal requirements be incorporated into this document.

Sincerely,

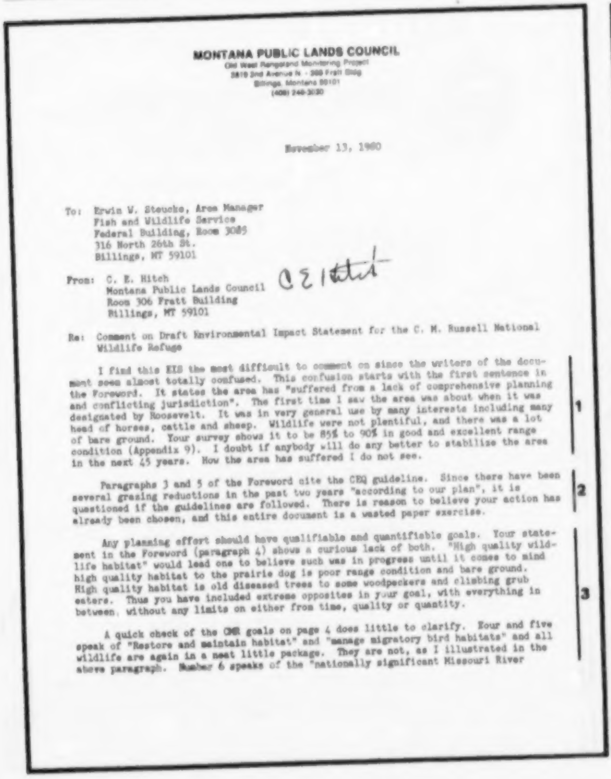
Marcella Sherfy
Deputy SHPO

MS/det



Response to Montana Historical Society

1. The FWS is in agreement that use of historic resources does not necessarily lead to their preservation; there is no intent to imply otherwise. A single heading is used to reduce the complexity and increase the readability of the text.
2. It is indicated in the EIS that the action for cultural resources is similar for all alternatives. The FWS will comply with all pertinent legislation concerning cultural resources as funds and manpower become available. Any variations in degree between alternatives are reflected by these two considerations.
3. Because of the sensitive nature of these resources, their vulnerability to unauthorized collecting, and after coordination with your office, FWS intentionally omitted this detailed information from the EIS. The data are, however, available in our Lewistown refuge headquarters for examination by qualified individuals.



MONTANA PUBLIC LANDS COUNCIL
Old West Rangeland Monitoring Project
2819 2nd Avenue N. - 306 Fratt Bldg
Billings, Montana 59101
(406) 248-3030

November 13, 1980

To: Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3035
316 North 26th St.
Billings, MT 59101

From: C. E. Hitch C E Hitch
Montana Public Lands Council
Room 306 Fratt Building
Billings, MT 59101

Re: Comment on Draft Environmental Impact Statement for the C. M. Russell National Wildlife Refuge

I find this EIS the most difficult to comment on since the writers of the document seem almost totally confused. This confusion starts with the first sentence in the Foreword. It states the area has "suffered from a lack of comprehensive planning and conflicting jurisdiction". The first time I saw the area was about when it was designated by Roosevelt. It was in very general use by many interests including many head of horses, cattle and sheep. Wildlife were not plentiful, and there was a lot of bare ground. Your survey shows it to be 85% to 90% in good and excellent range condition (Appendix 9). I doubt if anybody will do any better to stabilize the area in the next 45 years. How the area has suffered I do not see. 1

Paragraphs 3 and 5 of the Foreword cite the CEQ guideline. Since there have been several grazing reductions in the past two years "according to our plan", it is questioned if the guidelines are followed. There is reason to believe your action has already been chosen, and this entire document is a wasted paper exercise. 2

Any planning effort should have qualifiable and quantifiable goals. Your statement in the Foreword (paragraph 4) shows a curious lack of both. "High quality wildlife habitat" would lead one to believe such was in progress until it comes to mind high quality habitat to the prairie dog is poor range condition and bare ground. High quality habitat is old diseased trees to some woodpeckers and climbing grub eaters. Thus you have included extreme opposites in your goal, with everything in between, without any limits on either from time, quality or quantity. 3

A quick check of the CMR goals on page 4 does little to clarify. Four and five speak of "Restore and maintain habitat" and "manage migratory bird habitats" and all wildlife are again in a neat little package. They are not, as I illustrated in the above paragraph. Number 6 speaks of the "nationally significant Missouri River

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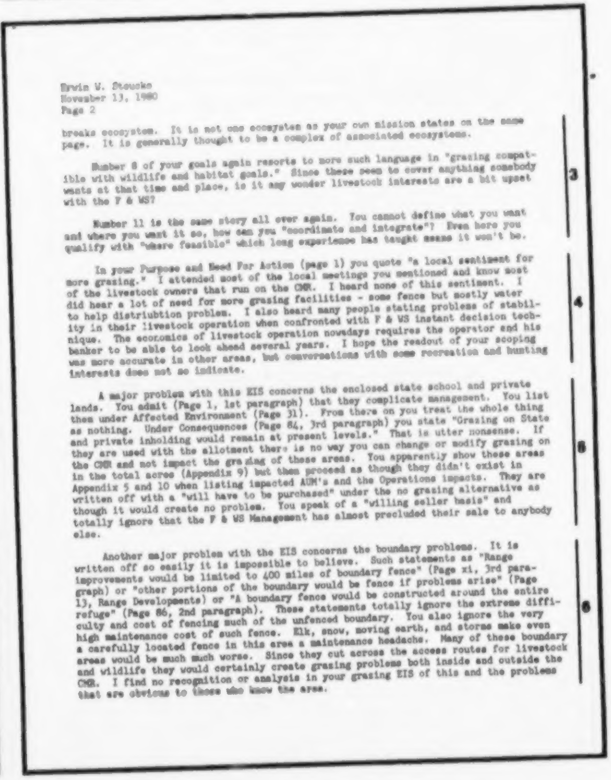

Erwin W. Steucke
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Page 2

breaks ecosystem. It is not one ecosystem as your own mission states on the same page. It is generally thought to be a complex of associated ecosystems.

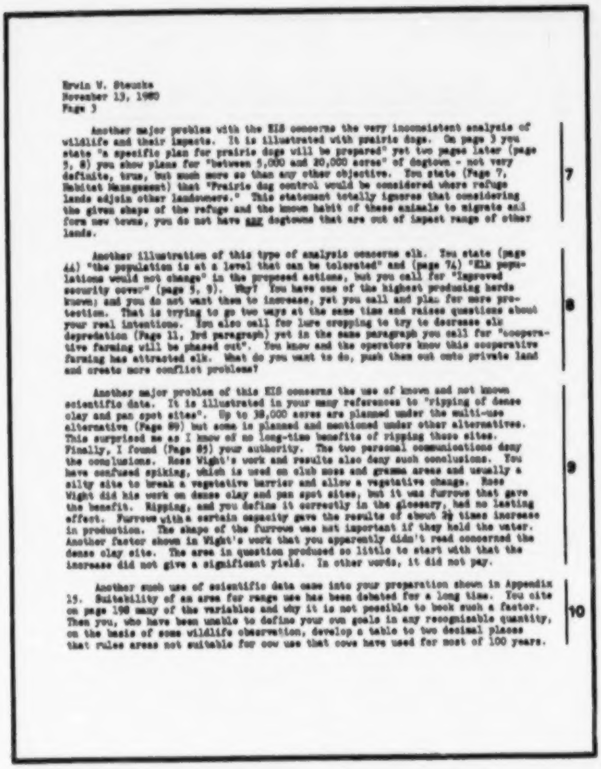
Number 8 of your goals again resorts to more such language in "grazing compatible with wildlife and habitat goals." Since these seem to cover anything somebody wants at that time and place, is it any wonder livestock interests are a bit upset with the F & WS? 3

Number 11 is the same story all over again. You cannot define what you want and where you want it so, how can you "coordinate and integrate"? Even here you qualify with "where feasible" which long experience has taught means it won't be.

In your Purpose and Need For Action (page 1) you quote "a local sentiment for more grazing." I attended most of the local meetings you mentioned and know most of the livestock owners that run on the CMR. I heard none of this sentiment. I did hear a lot of need for more grazing facilities - some fence but mostly water to help distriubtion problem. I also heard many people stating problems of stability in their livestock operation when confronted with F & WS instant decision technique. The economics of livestock operation nowadays requires the operator and his banker to be able to look ahead several years. I hope the readout of your scoping was more accurate in other areas, but conversations with some recreation and hunting interests does not so indicate. 4

A major problem with this EIS concerns the enclosed state school and private lands. You admit (Page 1, 1st paragraph) that they complicate management. You list them under Affected Environment (Page 31). From there on you treat the whole thing as nothing. Under Consequences (Page 84, 3rd paragraph) you state "Grazing on State and private inholding would remain at present levels." That is utter nonsense. If they are used with the allotment there is no way you can change or modify grazing on the CMR and not impact the grazing of these areas. You apparently show these areas in the total acres (Appendix 9) but then proceed as though they didn't exist in Appendix 5 and 10 when listing impacted AUM's and the Operations impacts. They are written off with a "will have to be purchased" under the no grazing alternative as though it would create no problem. You speak of a "willing seller basis" and totally ignore that the F & WS Management has almost precluded their sale to anybody else. 5

Another major problem with the EIS concerns the boundary problems. It is written off so easily it is impossible to believe. Such statements as "Range improvements would be limited to 400 miles of boundary fence" (Page xi, 3rd paragraph) or "other portions of the boundary would be fence if problems arise" (Page 13, Range Developments) or "A boundary fence would be constructed around the entire refuge" (Page 86, 2nd paragraph). These statements totally ignore the extreme difficulty and cost of fencing much of the unfenced boundary. You also ignore the very high maintenance cost of such fence. Elk, snow, moving earth, and storms make even a carefully located fence in this area a maintenance headache. Many of these boundary areas would be much much worse. Since they cut across the access routes for livestock and wildlife they would certainly create grazing problems both inside and outside the CMR. I find no recognition or analysis in your grazing EIS of this and the problems that are obvious to those who know the area. 6



Erwin V. Steucke
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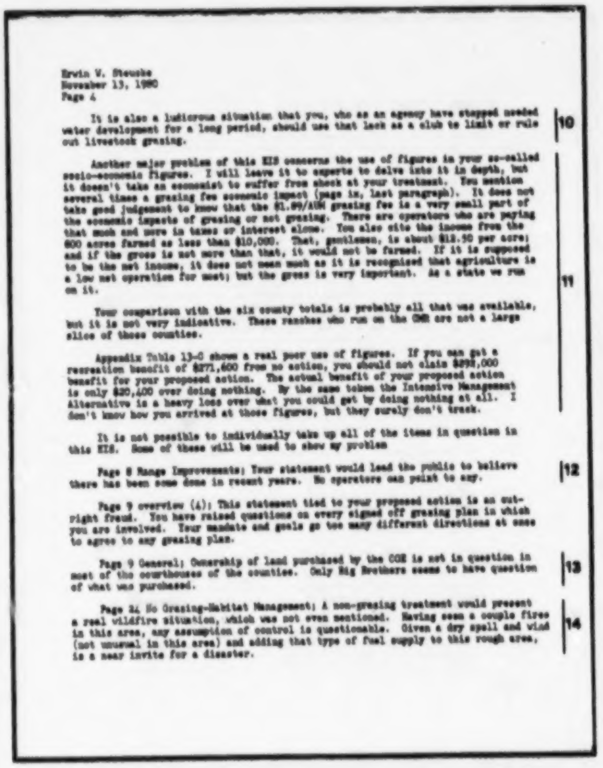
Page 3

Another major problem with the EIS concerns the very inconsistent analysis of wildlife and their impacts. It is illustrated with prairie dogs. On page 3 you state "a specific plan for prairie dogs will be prepared" yet two pages later (page 5, 8) you show plans for "between 5,000 and 20,000 acres" of dogtown - not very definite, true, but much more so than any other objective. You state (Page 7, Habitat Management) that "Prairie dog control would be considered where refuge lands adjoin other landowners." This statement totally ignores that considering the given shape of the refuge and the known habit of these animals to migrate and form new towns, you do not have any dogtowns that are out of impact range of other lands. 7

Another illustration of this type of analysis concerns elk. You state (page 44) "the population is at a level that can be tolerated" and (page 74) "Elk populations would not change" in the proposed actions, but you call for "improved security cover" (page 5, 9). Why? You have one of the highest producing herds known; and you do not want them to increase, yet you call and plan for more protection. That is trying to go two ways at the same time and raises questions about your real intentions. You also call for lure cropping to try to decrease elk depredation (Page 11, 3rd paragraph) yet in the same paragraph you call for "cooperative farming will be phased out". You know and the operators know this cooperative farming has attracted elk. What do you want to do, push them out onto private land and create more conflict problems? 8

Another major problem of this EIS concerns the use of known and not known scientific data. It is illustrated in your many references to "ripping of dense clay and pan spot sites". Up to 38,000 acres are planned under the multi-use alternative (Page 89) but some is planned and mentioned under other alternatives. This surprised me as I know of no long-time benefits of ripping these sites. Finally, I found (Page 85) your authority. The two personal communications deny the conclusions. Ross Wight's work and results also deny such conclusions. You have confused spiking, which is used on club moss and gramma areas and usually a silty site to break a vegetative barrier and allow a vegetative change. Ross Wight did his work on dense clay and pan spot sites, but it was furrows that gave the benefit. Ripping, and you define it correctly in the glossary, had no lasting effect. Furrows with a certain capacity gave the results of about 2½ times increase in production. The shape of the furrows was not important if they held the water. Another factor shown in Wight's work that you apparently didn't read concerned the dense clay site. The area in question produced so little to start with that the increase did not give a significant yield. In other words, it did not pay. 9

Another such use of scientific data came into your preparation shown in Appendix 15. Suitability of an area for range use has been debated for a long time. You cite on page 198 many of the variables and why it is not possible to book such a factor. Then you, who have been unable to define your own goals in any recognizable quantity, on the basis of some wildlife observation, develop a table to two decimal places that rules areas not suitable for cow use that cows have used for most of 100 years. 10



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Page 4

It is also a ludicrous situation that you, who as an agency have stopped needed water development for a long period, should use that lack as a club to limit or rule out livestock grazing. 10

Another major problem of this EIS concerns the use of figures in your so-called socio-economic figures. I will leave it to experts to delve into it in depth, but it doesn't take an economist to suffer from shock at your treatment. You mention several times a grazing fee economic impact (page ix, last paragraph). It does not take good judgement to know that the $1.89/AUM grazing fee is a very small part of the economic impacts of grazing or not grazing. There are operators who are paying that much and more in taxes or interest alone. You also cite the income from the 800 acres farmed as less than $10,000. That, gentlemen, is about $12.50 per acre; and if the gross is not more than that, it would not be farmed. If it is supposed to be the net income, it does not mean much as it is recognized that agriculture is a low net operation for most; but the gross is very important. As a state we run on it. 11

Your comparison with the six county totals is probably all that was available, but it is not very indicative. These ranches who run on the CMR are not a large slice of those counties.

Appendix Table 13-C shows a real poor use of figures. If you can get a recreation benefit of $271,600 from no action, you should not claim $292,000 benefit for your proposed action. The actual benefit of your proposed action is only $20,400 over doing nothing. By the same token the Intensive Management Alternative is a heavy loss over what you could get by doing nothing at all. I don't know how you arrived at those figures, but they surely don't track.

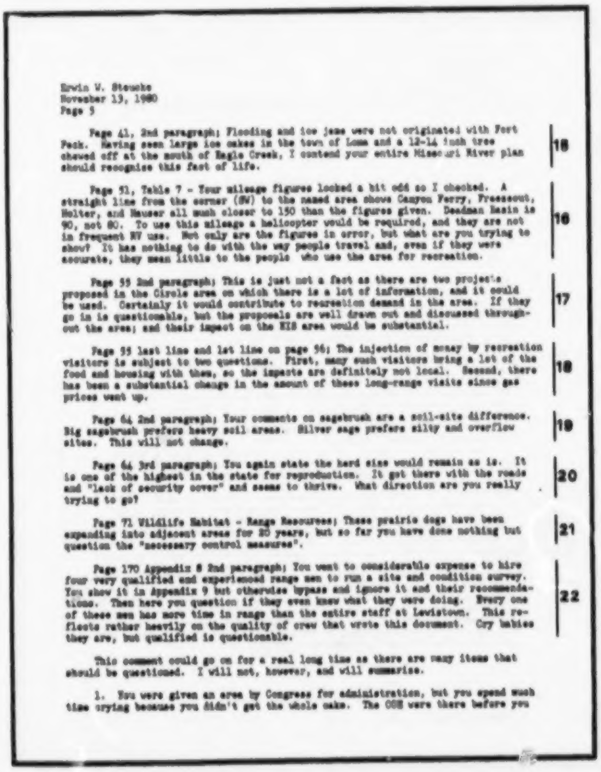
It is not possible to individually take up all of the items in question in this EIS. Some of these will be used to show my problem

Page 8 Range Improvements; Your statement would lead the public to believe there has been some done in recent years. No operators can point to any. 12

Page 9 overview (4); This statement tied to your proposed action is an outright fraud. You have raised questions on every signed off grazing plan in which you are involved. Your mandate and goals go too many different directions at once to agree to any grazing plan.

Page 9 General; Ownership of land purchased by the COE is not in question in most of the courthouses of the counties. Only Big Brothers seems to have question of what was purchased. 13

Page 24 No Grazing-Habitat Management; A non-grazing treatment would present a real wildfire situation, which was not even mentioned. Having seen a couple fires in this area, any assumption of control is questionable. Given a dry spell and wind (not unusual in this area) and adding that type of fuel supply to this rough area, is a near invite for a disaster. 14



Erwin V. Steucke
November 13, 1980
Page 5

Page 41, 2nd paragraph; Flooding and ice jams were not originated with Fort Peck. Having seen large ice cakes in the town of Loma and a 12-14 inch tree chewed off at the mouth of Eagle Creek, I contend your entire Missouri River plan should recognize this fact of life. 15

Page 51, Table 7 - Your mileage figures looked a bit odd so I checked. A straight line from the corner (NW) to the named area shows Canyon Ferry, Freezeout, Holter, and Hauser all much closer to 150 than the figures given. Deadman Basin is 90, not 80. To use this mileage a helicopter would be required, and they are not in frequent RV use. Not only are the figures in error, but what are you trying to show? It has nothing to do with the way people travel and, even if they were accurate, they mean little to the people who use the area for recreation. 16

Page 55 2nd paragraph; This is just not a fact as there are two projects proposed in the Circle area on which there is a lot of information, and it could be used. Certainly it would contribute to recreation demand in the area. If they go in is questionable, but the proposals are well drawn out and discussed throughout the area; and their impact on the EIS area would be substantial. 17

Page 55 last line and 1st line on page 56; The injection of money by recreation visitors is subject to two questions. First, many such visitors bring a lot of the food and housing with them, so the impacts are definitely not local. Second, there has been a substantial change in the amount of these long-range visits since gas prices went up. 18

Page 64 2nd paragraph; Your comments on sagebrush are a soil-site difference. Big sagebrush prefers heavy soil areas. Silver sage prefers silty and overflow sites. This will not change. 19

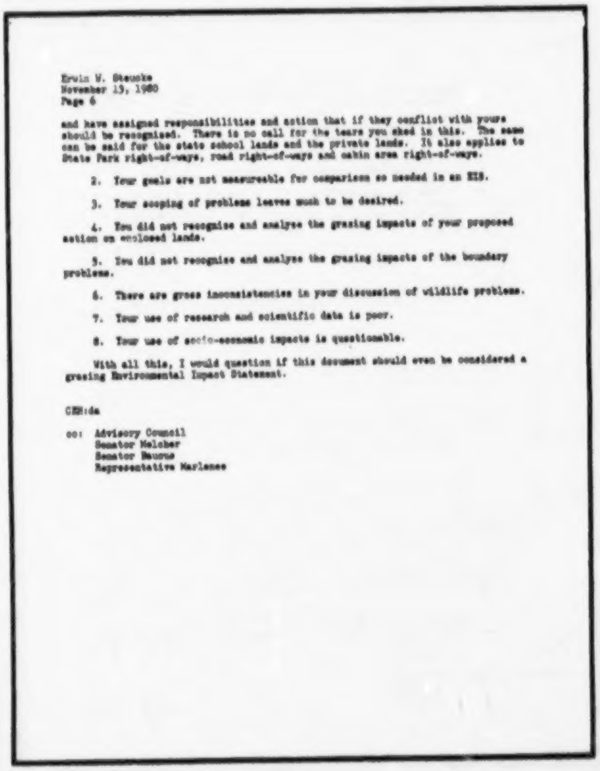
Page 64 3rd paragraph; You again state the herd size would remain as is. It is one of the highest in the state for reproduction. It got there with the roads and "lack of security cover" and seems to thrive. What direction are you really trying to go? 20

Page 71 Wildlife Habitat - Range Resources; These prairie dogs have been expanding into adjacent areas for 20 years, but so far you have done nothing but question the "necessary control measures". 21

Page 170 Appendix 8 2nd paragraph; You went to considerable expense to hire four very qualified and experienced range men to run a site and condition survey. You show it in Appendix 9 but otherwise bypass and ignore it and their recommendations. Then here you question if they even knew what they were doing. Every one of these men has more time in range than the entire staff at Lewistown. This reflects rather heavily on the quality of crew that wrote this document. Cry babies they are, but qualified is questionable. 22

This comment could go on for a real long time as there are many items that should be questioned. I will not, however, and will summarize.

1. You were given an area by Congress for administration, but you spend much time crying because you didn't get the whole cake. The COE were there before you



Erwin V. Steucke
November 13, 1980
Page 6

and have assigned responsibilities and action that if they conflict with yours should be recognized. There is no call for the tears you shed in this. The same can be said for the state school lands and the private lands. It also applies to State Park right-of-ways, road right-of-ways and cabin area right-of-ways.

2. Your goals are not measureable for comparison as needed in an EIS.

3. Your scoping of problems leaves much to be desired.

4. You did not recognize and analyze the grazing impacts of your proposed action on enclosed lands.

5. You did not recognize and analyze the grazing impacts of the boundary problems.

6. There are gross inconsistencies in your discussion of wildlife problems.

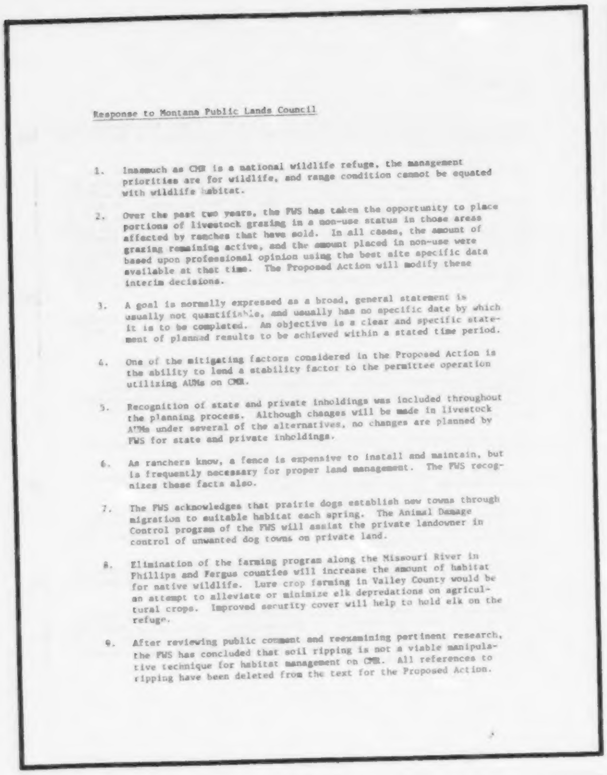
7. Your use of research and scientific data is poor.

8. Your use of socio-economic impacts is questionable.

With all this, I would question if this document should even be considered a grazing Environmental Impact Statement.

CEH:da

cc: Advisory Council
Senator Melcher
Senator Baucus
Representative Marlenee



Response to Montana Public Lands Council

1. Inasmuch as CMR is a national wildlife refuge, the management priorities are for wildlife, and range condition cannot be equated with wildlife habitat.

2. Over the past two years, the FWS has taken the opportunity to place portions of livestock grazing in a non-use status in those areas affected by ranches that have sold. In all cases, the amount of grazing remaining active, and the amount placed in non-use were based upon professional opinion using the best site specific data available at that time. The Proposed Action will modify these interim decisions.

3. A goal is normally expressed as a broad, general statement is usually not quantifiable, and usually has no specific date by which it is to be completed. An objective is a clear and specific statement of planned results to be achieved within a stated time period.

4. One of the mitigating factors considered in the Proposed Action is the ability to lend a stability factor to the permittee operation utilizing AUMs on CMR.

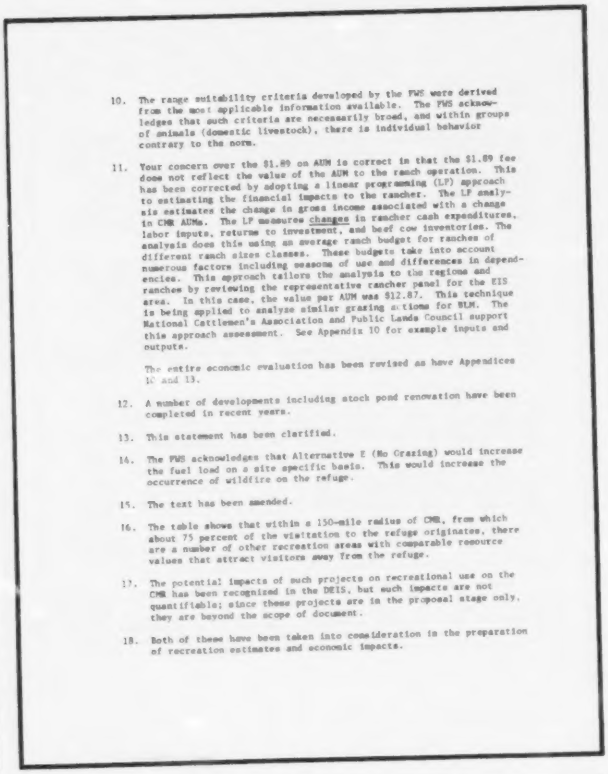
5. Recognition of state and private inholdings was included throughout the planning process. Although changes will be made in livestock AUMs under several of the alternatives, no changes are planned by FWS for state and private inholdings.

6. As ranchers know, a fence is expensive to install and maintain, but is frequently necessary for proper land management. The FWS recognizes these facts also.

7. The FWS acknowledges that prairie dogs establish new towns through migration to suitable habitat each spring. The Animal Damage Control program of the FWS will assist the private landowner in control of unwanted dog towns on private land.

8. Elimination of the farming program along the Missouri River in Phillips and Fergus counties will increase the amount of habitat for native wildlife. Lure crop farming in Valley County would be an attempt to alleviate or minimize elk depredations on agricultural crops. Improved security cover will help to hold elk on the refuge.

9. After reviewing public comment and reexamining pertinent research, the FWS has concluded that soil ripping is not a viable manipulative technique for habitat management on CMR. All references to ripping have been deleted from the text for the Proposed Action.



10. The range suitability criteria developed by the FWS were derived from the most applicable information available. The FWS acknowledges that such criteria are necessarily broad, and within groups of animals (domestic livestock), there is individual behavior contrary to the norm.

11. Your concern over the $1.89 on AUM is correct in that the $1.89 fee does not reflect the value of the AUM to the ranch operation. This has been corrected by adopting a linear programming (LP) approach to estimating the financial impacts to the rancher. The LP analysis estimates the change in gross income associated with a change in CMR AUMs. The LP measures changes in rancher cash expenditures, labor inputs, returns to investment, and beef cow inventories. The analysis does this using an average ranch budget for ranches of different ranch sizes classes. These budgets take into account numerous factors including seasons of use and differences in dependencies. This approach tailors the analysis to the regions and ranches by reviewing the representative rancher panel for the EIS area. In this case, the value per AUM was $12.87. This technique is being applied to analyze similar grazing actions for BLM. The National Cattlemen's Association and Public Lands Council support this approach assessment. See Appendix 10 for example inputs and outputs.

    The entire economic evaluation has been revised as have Appendices 10 and 13.

12. A number of developments including stock pond renovation have been completed in recent years.

13. This statement has been clarified.

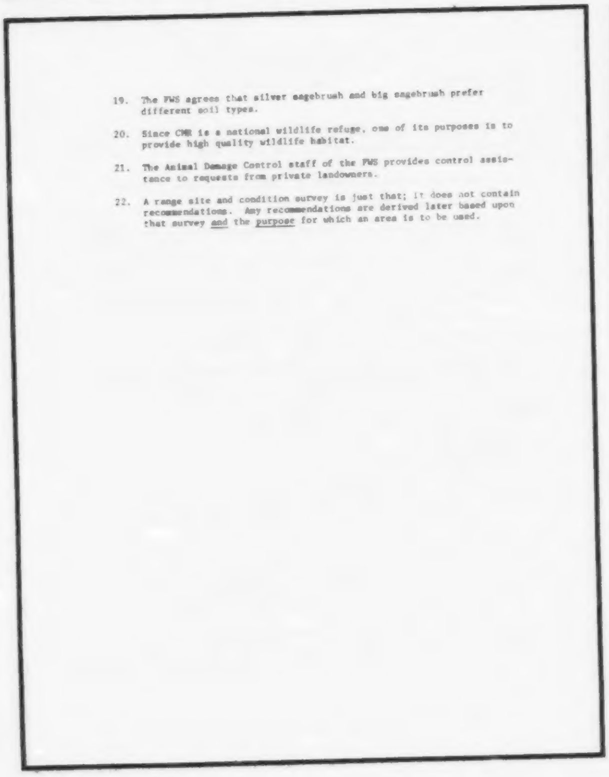
14. The FWS acknowledges that Alternative E (No Grazing) would increase the fuel load on a site specific basis. This would increase the occurrence of wildfire on the refuge.

15. The text has been amended.

16. The table shows that within a 150-mile radius of CMR, from which about 75 percent of the visitation to the refuge originates, there are a number of other recreation areas with comparable resource values that attract visitors away from the refuge.

17. The potential impacts of such projects on recreational use on the CMR has been recognized in the DEIS, but such impacts are not quantifiable; since these projects are in the proposal stage only, they are beyond the scope of document.

18. Both of these have been taken into consideration in the preparation of recreation estimates and economic impacts.

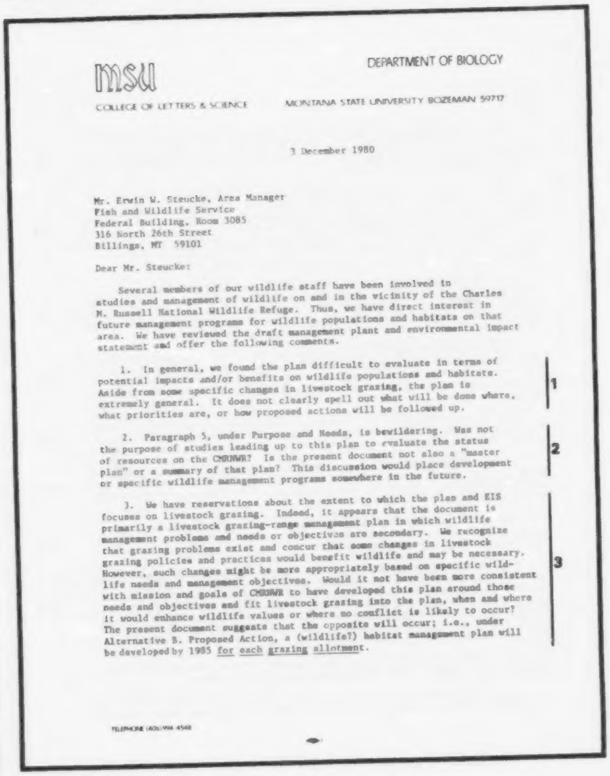


19. The FWS agrees that silver sagebrush and big sagebrush prefer different soil types.

20. Since CMR is a national wildlife refuge, one of its purposes is to provide high quality wildlife habitat.

21. The Animal Damage Control staff of the FWS provides control assistance to requests from private landowners.

22. A range site and condition survey is just that; it does not contain recommendations. Any recommendations are derived later based upon that survey and the purpose for which an area is to be used.



msu
DEPARTMENT OF BIOLOGY
COLLEGE OF LETTERS & SCIENCE
MONTANA STATE UNIVERSITY BOZEMAN 59717

3 December 1980

Mr. Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3085
316 North 26th Street
Billings, MT 59101

Dear Mr. Steucke:

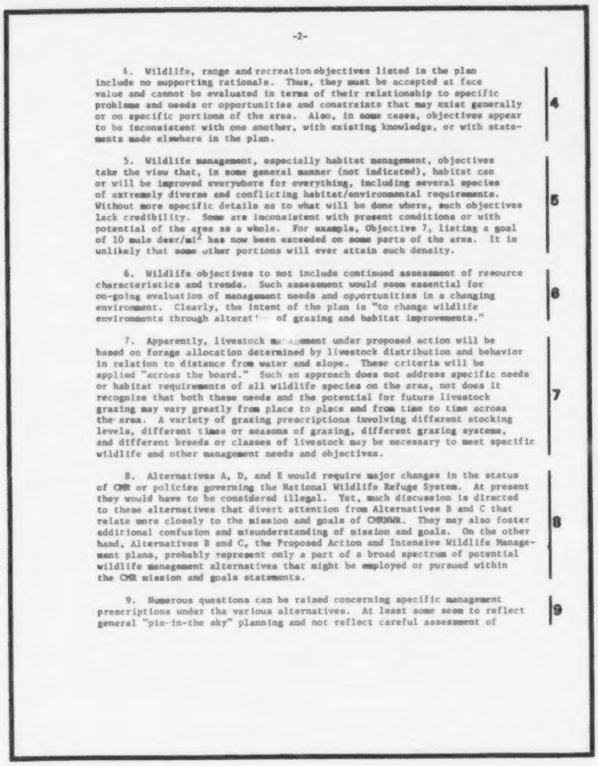
Several members of our wildlife staff have been involved in studies and management of wildlife on and in the vicinity of the Charles M. Russell National Wildlife Refuge. Thus, we have direct interest in future management programs for wildlife populations and habitats on that area. We have reviewed the draft management plant and environmental impact statement and offer the following comments.

1. In general, we found the plan difficult to evaluate in terms of potential impacts and/or benefits on wildlife populations and habitats. Aside from some specific changes in livestock grazing, the plan is extremely general. It does not clearly spell out what will be done where, what priorities are, or how proposed actions will be followed up. 1

2. Paragraph 5, under Purpose and Needs, is bewildering. Was not the purpose of studies leading up to this plan to evaluate the status of resources on the CMRNWR? Is the present document not also a "master plan" or a summary of that plan? This discussion would place development or specific wildlife management programs somewhere in the future. 2

3. We have reservations about the extent to which the plan and EIS focuses on livestock grazing. Indeed, it appears that the document is primarily a livestock grazing-range management plan in which wildlife management problems and needs or objectives are secondary. We recognize that grazing problems exist and concur that some changes in livestock grazing policies and practices would benefit wildlife and may be necessary. However, such changes might be more appropriately based on specific wildlife needs and management objectives. Would it not have been more consistent with mission and goals of CMRNWR to have developed this plan around those needs and objectives and fit livestock grazing into the plan, when and where it would enhance wildlife values or where no conflict is likely to occur? The present document suggests that the opposite will occur; i.e., under Alternative B. Proposed Action, a (wildlife?) habitat management plan will be developed by 1985 for each grazing allotment. 3

TELEPHONE (406) 994-4548



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4. Wildlife, range and recreation objectives listed in the plan include no supporting rationale. Thus, they must be accepted at face value and cannot be evaluated in terms of their relationship to specific problems and needs or opportunities and constraints that may exist generally or on specific portions of the area. Also, in some cases, objectives appear to be inconsistent with one another, with existing knowledge, or with statements made elsewhere in the plan. 4

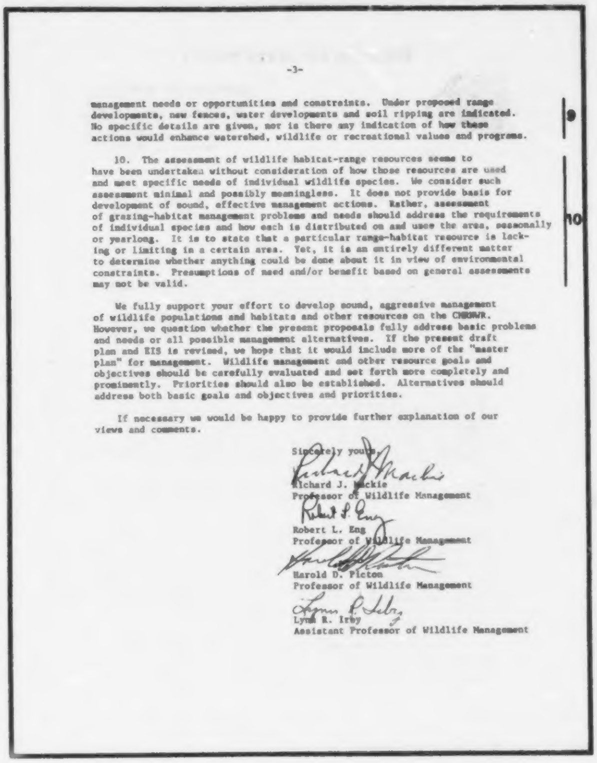
5. Wildlife management, especially habitat management, objectives take the view that, in some general manner (not indicated), habitat can or will be improved everywhere for everything, including several species of extremely diverse and conflicting habitat/environmental requirements. Without more specific details as to what will be done where, such objectives lack credibility. Some are inconsistent with present conditions or with potential of the area as a whole. For example, Objective 7, listing a goal of 10 mule deer/mi^2 has now been exceeded on some parts of the area. It is unlikely that some other portions will ever attain such density. 5

6. Wildlife objectives to not include continued assessment of resource characteristics and trends. Such assessment would seem essential for on-going evaluation of management needs and opportunities in a changing environment. Clearly, the intent of the plan is "to change wildlife environments through alteration of grazing and habitat improvements." 6

7. Apparently, livestock management under proposed action will be based on forage allocation determined by livestock distribution and behavior in relation to distance from water and slope. These criteria will be applied "across the board." Such an approach does not address specific needs or habitat requirements of all wildlife species on the area, not does it recognize that both these needs and the potential for future livestock grazing may vary greatly from place to place and from time to time across the area. A variety of grazing prescriptions involving different stocking levels, different times or seasons of grazing, different grazing systems, and different breeds or classes of livestock may be necessary to meet specific wildlife and other management needs and objectives. 7

8. Alternatives A, D, and E would require major changes in the status of CMR or policies governing the National Wildlife Refuge System. At present they would have to be considered illegal. Yet, much discussion is directed to these alternatives that divert attention from Alternatives B and C that relate more closely to the mission and goals of CMRNWR. They may also foster additional confusion and misunderstanding of mission and goals. On the other hand, Alternatives B and C, the Proposed Action and Intensive Wildlife Management plans, probably represent only a part of a broad spectrum of potential wildlife management alternatives that might be employed or pursued within the CMR mission and goals statements. 8

9. Numerous questions can be raised concerning specific management prescriptions under tha various alternatives. At least some seem to reflect general "pie-in-the sky" planning and not reflect careful assessment of 9



-3-

management needs or opportunities and constraints. Under proposed range developments, new fences, water developments and soil ripping are indicated. No specific details are given, nor is there any indication of how these actions would enhance watershed, wildlife or recreational values and programs. 9

10. The assessment of wildlife habitat-range resources seems to have been undertaken without consideration of how those resources are used and meet specific needs of individual wildlife species. We consider such assessment minimal and possibly meaningless. It does not provide basis for development of sound, effective management actions. Rather, assessment of grazing-habitat management problems and needs should address the requirements of individual species and how each is distributed on and uses the area, seasonally or yearlong. It is to state that a particular range-habitat resource is lacking or limiting in a certain area. Yet, it is an entirely different matter to determine whether anything could be done about it in view of environmental constraints. Presumptions of need and/or benefit based on general assessments may not be valid. 10

We fully support your effort to develop sound, aggressive management of wildlife populations and habitats and other resources on the CMRNWR. However, we question whether the present proposals fully address basic problems and needs or all possible management alternatives. If the present draft plan and EIS is revised, we hope that it would include more of the "master plan" for management. Wildlife management and other resource goals and objectives should be carefully evaluated and set forth more completely and prominently. Priorities should also be established. Alternatives should address both basic goals and objectives and priorities.

If necessary we would be happy to provide further explanation of our views and comments.

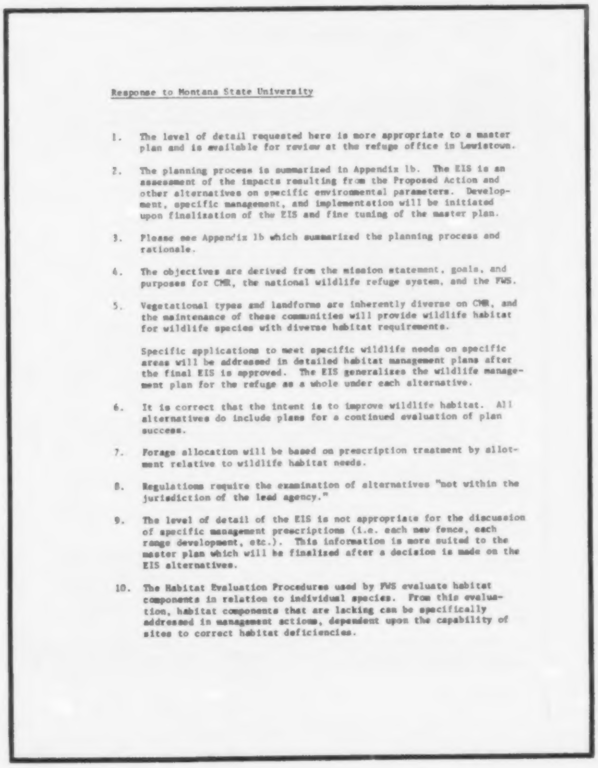
Sincerely yours,

Richard J. Mackie
Professor of Wildlife Management

Robert L. Eng
Professor of Wildlife Management

Harold D. Picton
Professor of Wildlife Management

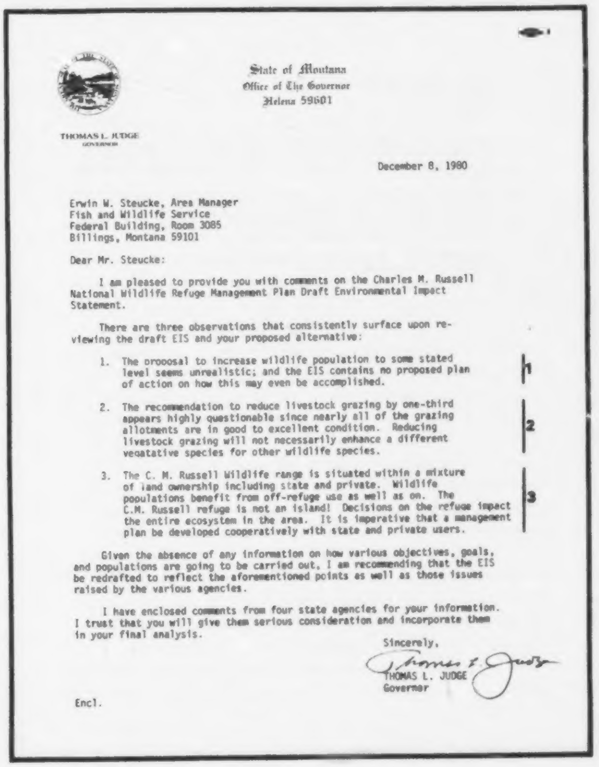
Lynn R. Irby
Assistant Professor of Wildlife Management



Response to Montana State University

1. The level of detail requested here is more appropriate to a master plan and is available for review at the refuge office in Lewistown.
2. The planning process is summarized in Appendix 1b. The EIS is an assessment of the impacts resulting from the Proposed Action and other alternatives on specific environmental parameters. Development, specific management, and implementation will be initiated upon finalization of the EIS and fine tuning of the master plan.
3. Please see Appendix 1b which summarized the planning process and rationale.
4. The objectives are derived from the mission statement, goals, and purposes for CMR, the national wildlife refuge system, and the FWS.
5. Vegetational types and landforms are inherently diverse on CMR, and the maintenance of these communities will provide wildlife habitat for wildlife species with diverse habitat requirements.

   Specific applications to meet specific wildlife needs on specific areas will be addressed in detailed habitat management plans after the final EIS is approved. The EIS generalizes the wildlife management plan for the refuge as a whole under each alternative.
6. It is correct that the intent is to improve wildlife habitat. All alternatives do include plans for a continued evaluation of plan success.
7. Forage allocation will be based on prescription treatment by allotment relative to wildlife habitat needs.
8. Regulations require the examination of alternatives "not within the jurisdiction of the lead agency."
9. The level of detail of the EIS is not appropriate for the discussion of specific management prescriptions (i.e. each new fence, each range development, etc.). This information is more suited to the master plan which will be finalized after a decision is made on the EIS alternatives.
10. The Habitat Evaluation Procedures used by FWS evaluate habitat components in relation to individual species. From this evaluation, habitat components that are lacking can be specifically addressed in management actions, dependent upon the capability of sites to correct habitat deficiencies.



State of Montana
Office of The Governor
Helena 59601

THOMAS L. JUDGE
GOVERNOR

December 8, 1980

Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3085
Billings, Montana 59101

Dear Mr. Steucke:

I am pleased to provide you with comments on the Charles M. Russell National Wildlife Refuge Management Plan Draft Environmental Impact Statement.

There are three observations that consistently surface upon reviewing the draft EIS and your proposed alternative:

1. The proposal to increase wildlife population to some stated level seems unrealistic; and the EIS contains no proposed plan of action on how this may even be accomplished. 1
2. The recommendation to reduce livestock grazing by one-third appears highly questionable since nearly all of the grazing allotments are in good to excellent condition. Reducing livestock grazing will not necessarily enhance a different vegatative species for other wildlife species. 2
3. The C. M. Russell Wildlife range is situated within a mixture of land ownership including state and private. Wildlife populations benefit from off-refuge use as well as on. The C.M. Russell refuge is not an island! Decisions on the refuge impact the entire ecosystem in the area. It is imperative that a management plan be developed cooperatively with state and private users. 3

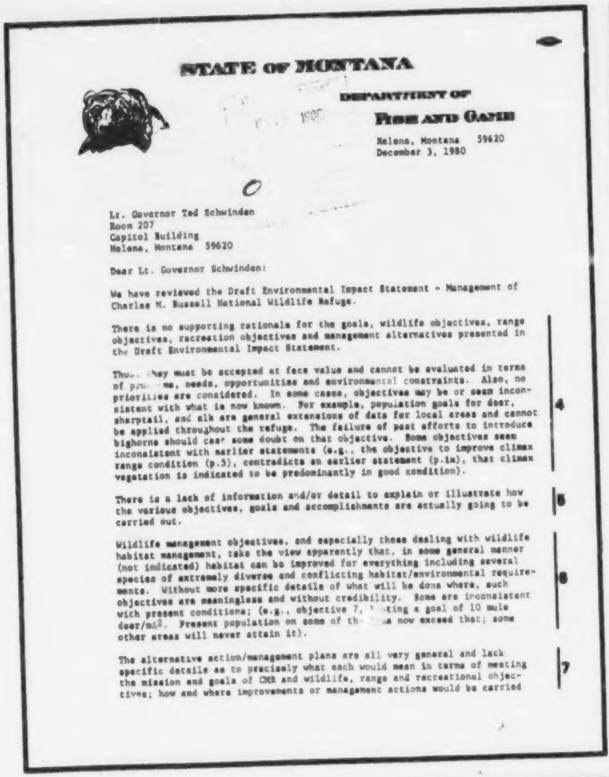
Given the absence of any information on how various objectives, goals, and populations are going to be carried out, I am recommending that the EIS be redrafted to reflect the aforementioned points as well as those issues raised by the various agencies.

I have enclosed comments from four state agencies for your information. I trust that you will give them serious consideration and incorporate them in your final analysis.

Sincerely,

Thomas L. Judge
THOMAS L. JUDGE
Governor

Encl.



STATE OF MONTANA
DEPARTMENT OF
FISH AND GAME
Helena, Montana 59620

December 3, 1980

Lt. Governor Ted Schwinden
Room 207
Capitol Building
Helena, Montana 59620

Dear Lt. Governor Schwinden:

We have reviewed the Draft Environmental Impact Statement - Management of Charles M. Russell National Wildlife Refuge.

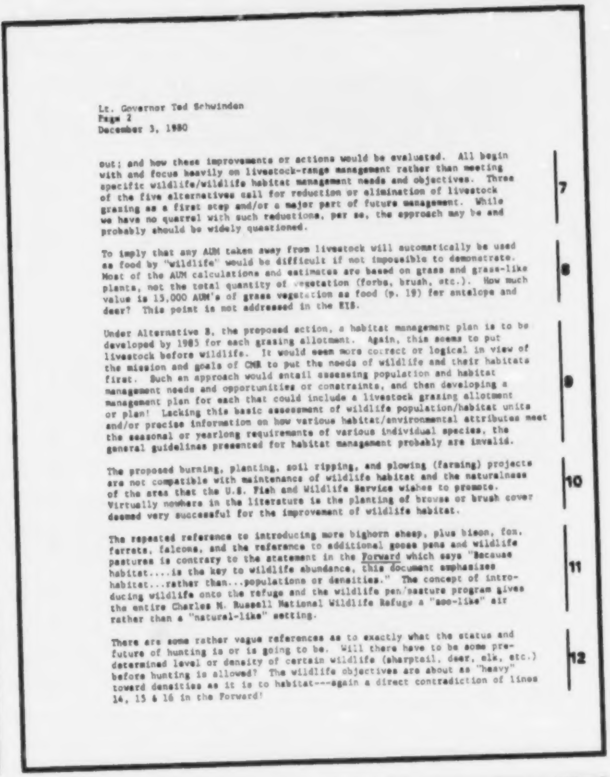
There is no supporting rationale for the goals, wildlife objectives, range objectives, recreation objectives and management alternatives presented in the Draft Environmental Impact Statement.

Thus, they must be accepted at face value and cannot be evaluated in terms of problems, needs, opportunities and environmental constraints. Also, no priorities are considered. In some cases, objectives may be or seem inconsistent with what is now known. For example, population goals for deer, sharptail, and elk are general extensions of data for local areas and cannot be applied throughout the refuge. The failure of past efforts to introduce bighorns should cast some doubt on that objective. Some objectives seem inconsistent with earlier statements (e.g., the objective to improve climax range condition (p.3), contradicts an earlier statement (p.ix), that climax vegetation is indicated to be predominantly in good condition). 4

There is a lack of information and/or detail to explain or illustrate how the various objectives, goals and accomplishments are actually going to be carried out. 5

Wildlife management objectives, and especially those dealing with wildlife habitat management, take the view apparently that, in some general manner (not indicated) habitat can be improved for everything including several species of extremely diverse and conflicting habitat/environmental requirements. Without more specific details of what will be done where, such objectives are meaningless and without credibility. Some are inconsistent with present conditions; (e.g., objective 7, listing a goal of 10 mule deer/mi^2. Present population on some of the areas now exceed that; some other areas will never attain it). 6

The alternative action/management plans are all very general and lack specific details as to precisely what each would mean in terms of meeting the mission and goals of CMR and wildlife, range and recreational objectives; how and where improvements or management actions would be carried 7



Lt. Governor Ted Schwinden
Page 2
December 3, 1980

out; and how these improvements or actions would be evaluated. All begin with and focus heavily on livestock-range management rather than meeting specific wildlife/wildlife habitat management needs and objectives. Three of the five alternatives call for reduction or elimination of livestock grazing as a first step and/or a major part of future management. While we have no quarrel with such reductions, per se, the approach may be and probably should be widely questioned. 7

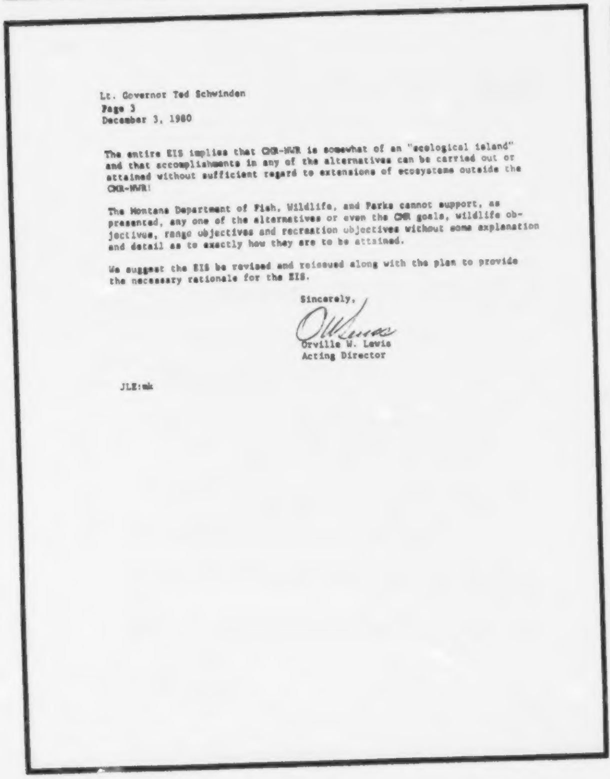
To imply that any AUM taken away from livestock will automatically be used as food by "wildlife" would be difficult if not impossible to demonstrate. Most of the AUM calculations and estimates are based on grass and grass-like plants, not the total quantity of vegetation (forbs, brush, etc.). How much value is 15,000 AUM's of grass vegetation as food (p. 19) for antelope and deer? This point is not addressed in the EIS. 8

Under Alternative B, the proposed action, a habitat management plan is to be developed by 1985 for each grazing allotment. Again, this seems to put livestock before wildlife. It would seem more correct or logical in view of the mission and goals of CMR to put the needs of wildlife and their habitats first. Such an approach would entail assessing population and habitat management needs and opportunities or constraints, and then developing a management plan for each that could include a livestock grazing allotment or plan! Lacking this basic assessment of wildlife population/habitat units and/or precise information on how various habitat/environmental attributes meet the seasonal or yearlong requirements of various individual species, the general guidelines presented for habitat management probably are invalid. 9

The proposed burning, planting, soil ripping, and plowing (farming) projects are not compatible with maintenance of wildlife habitat and the naturalness of the area that the U.S. Fish and Wildlife Service wishes to promote. Virtually nowhere in the literature is the planting of browse or brush cover deemed very successful for the improvement of wildlife habitat. 10

The repeated reference to introducing more bighorn sheep, plus bison, fox, ferrets, falcons, and the reference to additional goose pens and wildlife pastures is contrary to the statement in the Forward which says "Because habitat....is the key to wildlife abundance, this document emphasizes habitat...rather than...populations or densities." The concept of introducing wildlife onto the refuge and the wildlife pen/pasture program gives the entire Charles M. Russell National Wildlife Refuge a "zoo-like" air rather than a "natural-like" setting. 11

There are some rather vague references as to exactly what the status and future of hunting is or is going to be. Will there have to be some predetermined level or density of certain wildlife (sharptail, deer, elk, etc.) before hunting is allowed? The wildlife objectives are about as "heavy" toward densities as it is to habitat---again a direct contradiction of lines 14, 15 & 16 in the Forward! 12



Lt. Governor Ted Schwinden
Page 3
December 3, 1980

The entire EIS implies that CMR-NWR is somewhat of an "ecological island" and that accomplishments in any of the alternatives can be carried out or attained without sufficient regard to extensions of ecosystems outside the CMR-NWR!

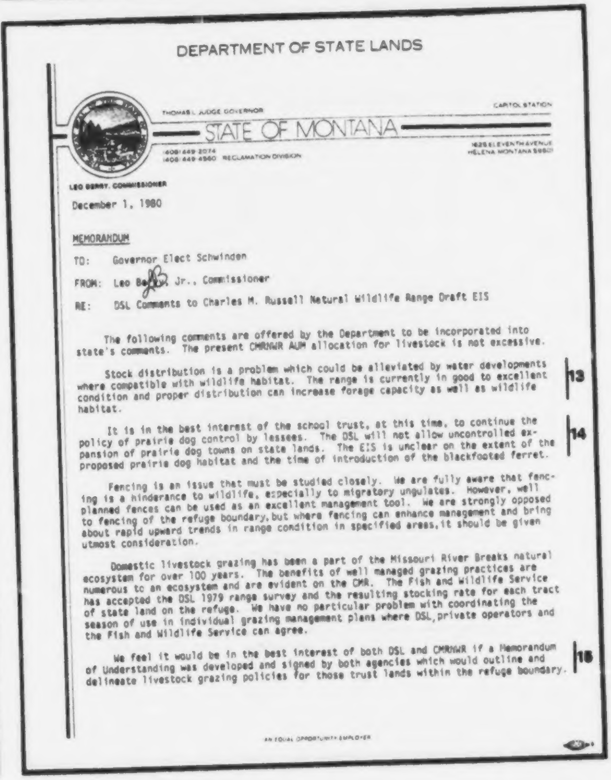
The Montana Department of Fish, Wildlife, and Parks cannot support, as presented, any one of the alternatives or even the CMR goals, wildlife objectives, range objectives and recreation objectives without some explanation and detail as to exactly how they are to be attained.

We suggest the EIS be revised and reissued along with the plan to provide the necessary rationale for the EIS.

Sincerely,

OWLewis
Orville W. Lewis
Acting Director

JLE:mk



DEPARTMENT OF STATE LANDS

THOMAS L. JUDGE GOVERNOR
STATE OF MONTANA
(406) 449-2074
(406) 449-4560 RECLAMATION DIVISION
CAPITOL STATION
1625 ELEVENTH AVENUE
HELENA MONTANA 59601
LEO BERRY, COMMISSIONER

December 1, 1980

MEMORANDUM

TO: Governor Elect Schwinden

FROM: Leo Berry, Jr., Commissioner

RE: DSL Comments to Charles M. Russell Natural Wildlife Range Draft EIS

The following comments are offered by the Department to be incorporated into state's comments. The present CMRNWR AUM allocation for livestock is not excessive.

Stock distribution is a problem which could be alleviated by water developments where compatible with wildlife habitat. The range is currently in good to excellent condition and proper distribution can increase forage capacity as well as wildlife habitat. 13

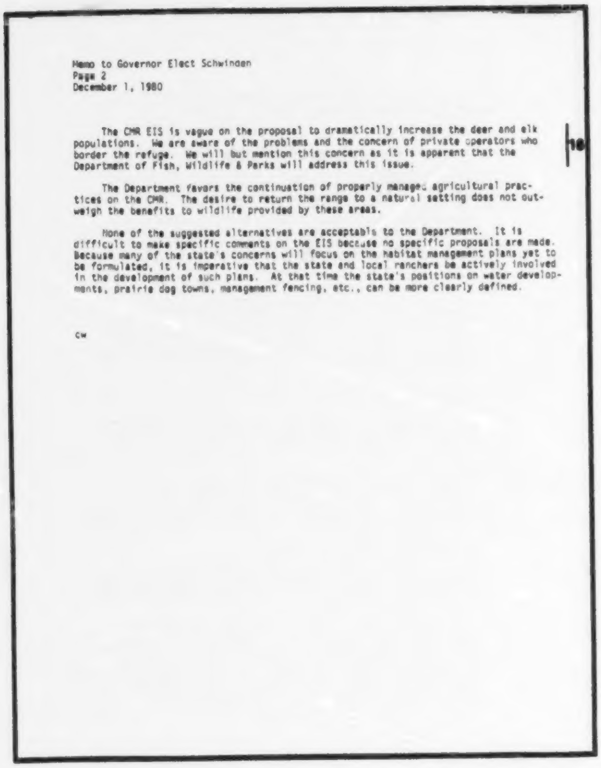
It is in the best interest of the school trust, at this time, to continue the policy of prairie dog control by lessees. The DSL will not allow uncontrolled expansion of prairie dog towns on state lands. The EIS is unclear on the extent of the proposed prairie dog habitat and the time of introduction of the blackfooted ferret. 14

Fencing is an issue that must be studied closely. We are fully aware that fencing is a hinderance to wildlife, especially to migratory ungulates. However, well planned fences can be used as an excellent management tool. We are strongly opposed to fencing of the refuge boundary, but where fencing can enhance management and bring about rapid upward trends in range condition in specified areas, it should be given utmost consideration.

Domestic livestock grazing has been a part of the Missouri River Breaks natural ecosystem for over 100 years. The benefits of well managed grazing practices are numerous to an ecosystem and are evident on the CMR. The Fish and Wildlife Service has accepted the DSL 1979 range survey and the resulting stocking rate for each tract of state land on the refuge. We have no particular problem with coordinating the season of use in individual grazing management plans where DSL, private operators and the Fish and Wildlife Service can agree.

We feel it would be in the best interest of both DSL and CMRNWR if a Memorandum of Understanding was developed and signed by both agencies which would outline and delineate livestock grazing policies for those trust lands within the refuge boundary. 15

AN EQUAL OPPORTUNITY EMPLOYER



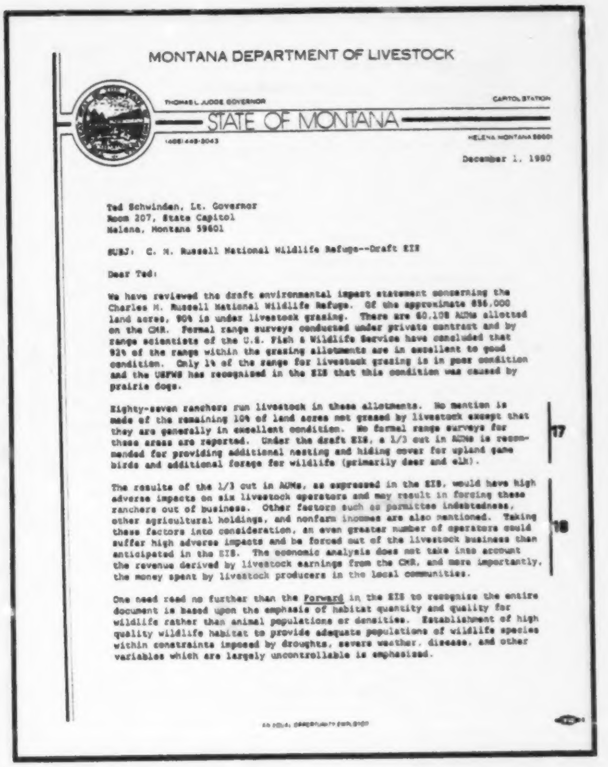
Memo to Governor Elect Schwinden
Page 2
December 1, 1980

The CMR EIS is vague on the proposal to dramatically increase the deer and elk populations. We are aware of the problems and the concern of private operators who border the refuge. We will but mention this concern as it is apparent that the Department of Fish, Wildlife & Parks will address this issue. 16

The Department favors the continuation of properly managed agricultural practices on the CMR. The desire to return the range to a natural setting does not outweigh the benefits to wildlife provided by these areas.

None of the suggested alternatives are acceptable to the Department. It is difficult to make specific comments on the EIS because no specific proposals are made. Because many of the state's concerns will focus on the habitat management plans yet to be formulated, it is imperative that the state and local ranchers be actively involved in the development of such plans. At that time the state's positions on water developments, prairie dog towns, management fencing, etc., can be more clearly defined.

cw



MONTANA DEPARTMENT OF LIVESTOCK

THOMAS L. JUDGE GOVERNOR
STATE OF MONTANA
CAPITOL STATION
(406) 449-2043
HELENA MONTANA 59601

December 1, 1980

Ted Schwinden, Lt. Governor
Room 207, State Capitol
Helena, Montana 59601

SUBJ: C. M. Russell National Wildlife Refuge--Draft EIS

Dear Ted:

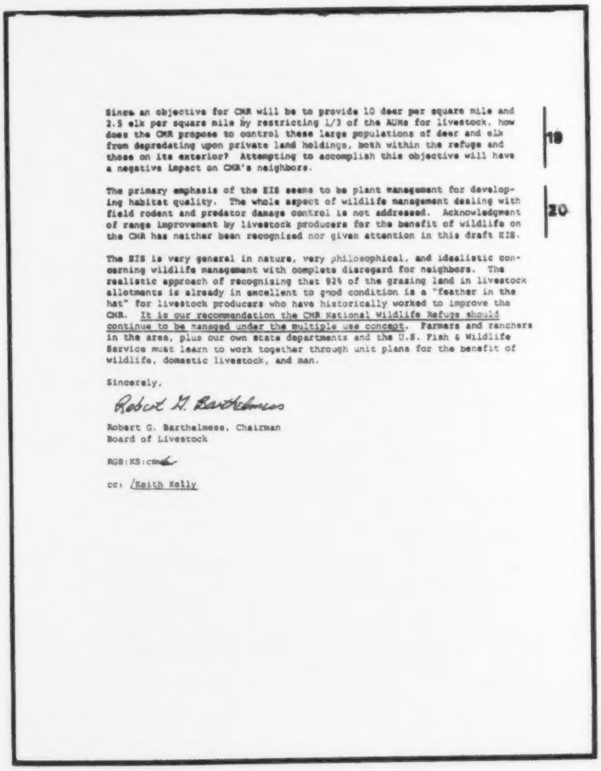
We have reviewed the draft environmental impact statement concerning the Charles M. Russell National Wildlife Refuge. Of the approximate 836,000 land acres, 90% is under livestock grazing. There are 60,108 AUMs allotted on the CMR. Formal range surveys conducted under private contract and by range scientists of the U.S. Fish & Wildlife Service have concluded that 92% of the range within the grazing allotments are in excellent to good condition. Only 1% of the range for livestock grazing is in poor condition and the USFWS has recognized in the EIS that this condition was caused by prairie dogs.

Eighty-seven ranchers run livestock in these allotments. No mention is made of the remaining 10% of land acres not grazed by livestock except that they are generally in excellent condition. No formal range surveys for these areas are reported. Under the draft EIS, a 1/3 cut in AUMs is recommended for providing additional nesting and hiding cover for upland game birds and additional forage for wildlife (primarily deer and elk). 17

The results of the 1/3 cut in AUMs, as expressed in the EIS, would have high adverse impacts on six livestock operators and may result in forcing these ranchers out of business. Other factors such as permittee indebtedness, other agricultural holdings, and nonfarm incomes are also mentioned. Taking these factors into consideration, an even greater number of operators could suffer high adverse impacts and be forced out of the livestock business than anticipated in the EIS. The economic analysis does not take into account the revenue derived by livestock earnings from the CMR, and more importantly, the money spent by livestock producers in the local communities. 18

One need read no further than the Forward in the EIS to recognize the entire document is based upon the emphasis of habitat quantity and quality for wildlife rather than animal populations or densities. Establishment of high quality wildlife habitat to provide adequate populations of wildlife species within constraints imposed by droughts, severe weather, disease, and other variables which are largely uncontrollable is emphasized.

AN EQUAL OPPORTUNITY EMPLOYER



Since an objective for CMR will be to provide 10 deer per square mile and 2.5 elk per square mile by restricting 1/3 of the AUMs for livestock, how does the CMR propose to control these large populations of deer and elk from depredating upon private land holdings, both within the refuge and those on its exterior? Attempting to accomplish this objective will have a negative impact on CMR's neighbors. 19

The primary emphasis of the EIS seems to be plant management for developing habitat quality. The whole aspect of wildlife management dealing with field rodent and predator damage control is not addressed. Acknowledgment of range improvement by livestock producers for the benefit of wildlife on the CMR has neither been recognized nor given attention in this draft EIS. 20

The EIS is very general in nature, very philosophical, and idealistic concerning wildlife management with complete disregard for neighbors. The realistic approach of recognizing that 92% of the grazing land in livestock allotments is already in excellent to good condition is a "feather in the hat" for livestock producers who have historically worked to improve the CMR. It is our recommendation the CMR National Wildlife Refuge should continue to be managed under the multiple use concept. Farmers and ranchers in the area, plus our own state departments and the U.S. Fish & Wildlife Service must learn to work together through unit plans for the benefit of wildlife, domestic livestock, and man.

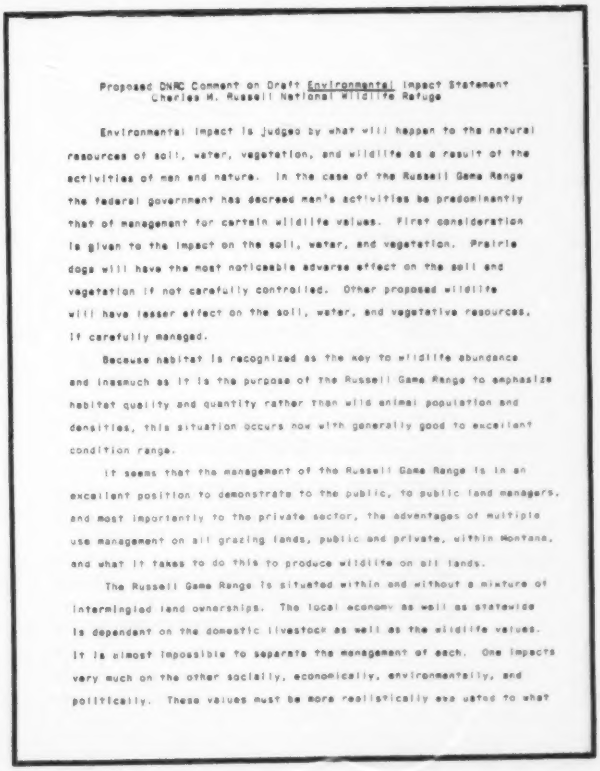
Sincerely,

Robert G. Barthelmess

Robert G. Barthelmess, Chairman
Board of Livestock

RGB:KS:cm

cc: /Keith Kelly



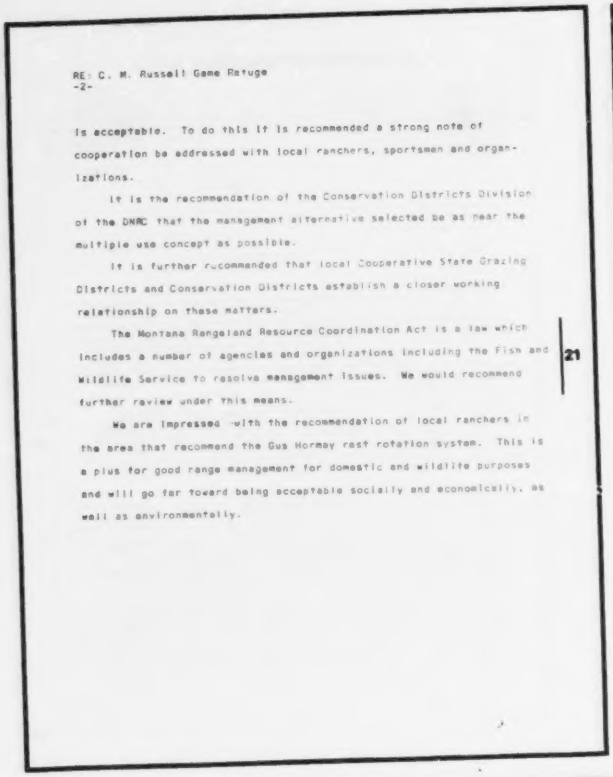
Proposed DNRC Comment on Draft Environmental Impact Statement
Charles M. Russell National Wildlife Refuge

Environmental impact is judged by what will happen to the natural resources of soil, water, vegetation, and wildlife as a result of the activities of man and nature. In the case of the Russell Game Range the federal government has decreed man's activities be predominantly that of management for certain wildlife values. First consideration is given to the impact on the soil, water, and vegetation. Prairie dogs will have the most noticeable adverse effect on the soil and vegetation if not carefully controlled. Other proposed wildlife will have lesser effect on the soil, water, and vegetative resources, if carefully managed.

Because habitat is recognized as the key to wildlife abundance and inasmuch as it is the purpose of the Russell Game Range to emphasize habitat quality and quantity rather than wild animal population and densities, this situation occurs now with generally good to excellent condition range.

It seems that the management of the Russell Game Range is in an excellent position to demonstrate to the public, to public land managers, and most importantly to the private sector, the advantages of multiple use management on all grazing lands, public and private, within Montana, and what it takes to do this to produce wildlife on all lands.

The Russell Game Range is situated within and without a mixture of intermingled land ownerships. The local economy as well as statewide is dependent on the domestic livestock as well as the wildlife values. It is almost impossible to separate the management of each. One impacts very much on the other socially, economically, environmentally, and politically. These values must be more realistically evaluated to what



RE: C. M. Russell Game Refuge
-2-

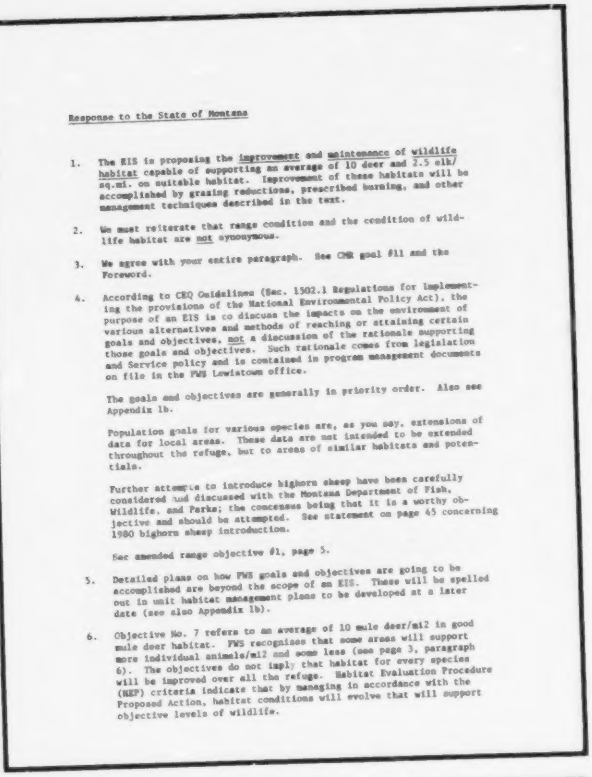
is acceptable. To do this it is recommended a strong note of cooperation be addressed with local ranchers, sportsmen and organizations.

It is the recommendation of the Conservation Districts Division of the DNRC that the management alternative selected be as near the multiple use concept as possible.

It is further recommended that local Cooperative State Grazing Districts and Conservation Districts establish a closer working relationship on these matters.

The Montana Rangeland Resource Coordination Act is a law which includes a number of agencies and organizations including the Fish and Wildlife Service to resolve management issues. We would recommend further review under this means. 21

We are impressed with the recommendation of local ranchers in the area that recommend the Gus Hormay rest rotation system. This is a plus for good range management for domestic and wildlife purposes and will go far toward being acceptable socially and economically, as well as environmentally.



Response to the State of Montana

1. The EIS is proposing the improvement and maintenance of wildlife habitat capable of supporting an average of 10 deer and 2.5 elk/sq.mi. on suitable habitat. Improvement of these habitats will be accomplished by grazing reductions, prescribed burning, and other management techniques described in the text.

2. We must reiterate that range condition and the condition of wildlife habitat are not synonymous.

3. We agree with your entire paragraph. See CMR goal #11 and the Foreword.

4. According to CEQ Guidelines (Sec. 1502.1 Regulations for Implementing the provisions of the National Environmental Policy Act), the purpose of an EIS is co discuss the impacts on the environment of various alternatives and methods of reaching or attaining certain goals and objectives, not a discussion of the rationale supporting those goals and objectives. Such rationale comes from legislation and Service policy and is contained in program management documents on file in the FWS Lewistown office.

   The goals and objectives are generally in priority order. Also see Appendix 1b.

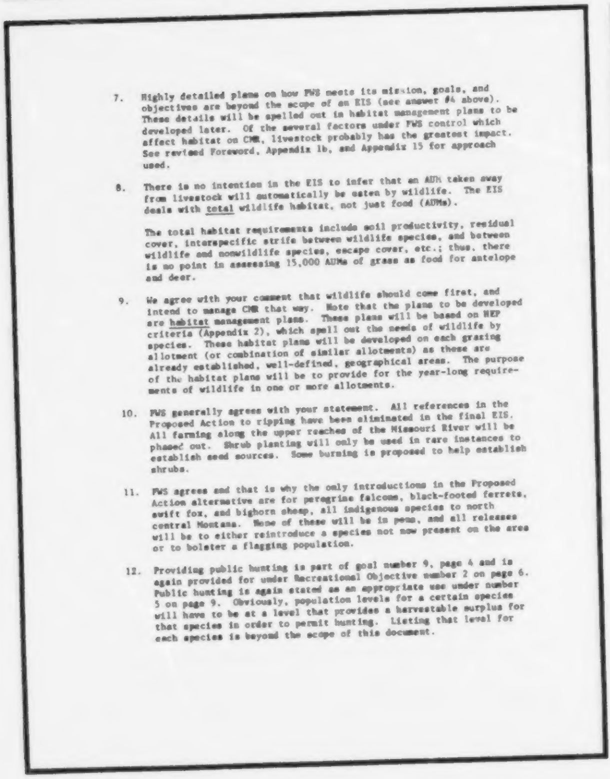
   Population goals for various species are, as you say, extensions of data for local areas. These data are not intended to be extended throughout the refuge, but to areas of similar habitats and potentials.

   Further attempts to introduce bighorn sheep have been carefully considered and discussed with the Montana Department of Fish, Wildlife, and Parks; the concensus being that it is a worthy objective and should be attempted. See statement on page 45 concerning 1980 bighorn sheep introduction.

   See amended range objective #1, page 5.

5. Detailed plans on how FWS goals and objectives are going to be accomplished are beyond the scope of an EIS. These will be spelled out in unit habitat management plans to be developed at a later date (see also Appendix 1b).

6. Objective No. 7 refers to an average of 10 mule deer/mi2 in good mule deer habitat. FWS recognizes that some areas will support more individual animals/mi2 and some less (see page 3, paragraph 6). The objectives do not imply that habitat for every species will be improved over all the refuge. Habitat Evaluation Procedure (HEP) criteria indicate that by managing in accordance with the Proposed Action, habitat conditions will evolve that will support objective levels of wildlife.



7. Highly detailed plans on how FWS meets its mission, goals, and objectives are beyond the scope of an EIS (see answer #4 above). These details will be spelled out in habitat management plans to be developed later. Of the several factors under FWS control which affect habitat on CMR, livestock probably has the greatest impact. See revised Foreword, Appendix 1b, and Appendix 15 for approach used.

8. There is no intention in the EIS to infer that an AUM taken away from livestock will automatically be eaten by wildlife. The EIS deals with total wildlife habitat, not just food (AUMs).

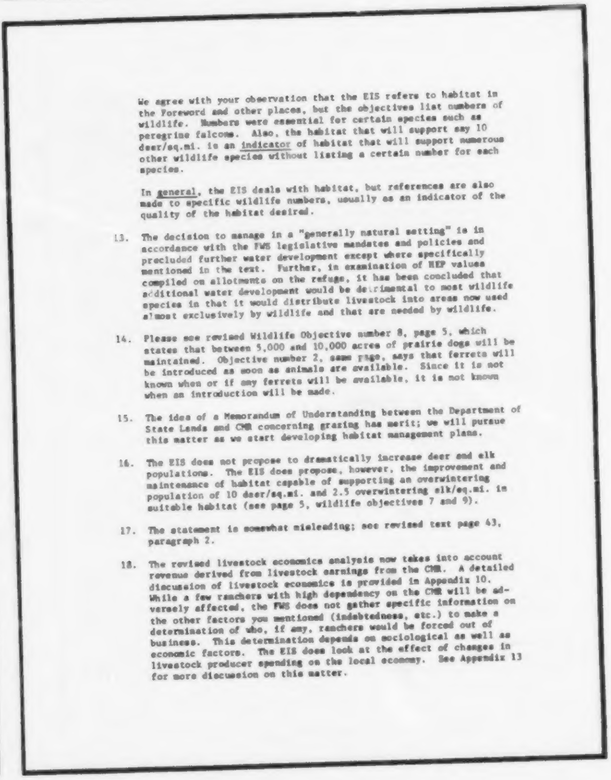
   The total habitat requirements include soil productivity, residual cover, interspecific strife between wildlife species, and between wildlife and nonwildlife species, escape cover, etc.; thus, there is no point in assessing 15,000 AUMs of grass as food for antelope and deer.

9. We agree with your comment that wildlife should come first, and intend to manage CMR that way. Note that the plans to be developed are habitat management plans. These plans will be based on HEP criteria (Appendix 2), which spell out the needs of wildlife by species. These habitat plans will be developed on each grazing allotment (or combination of similar allotments) as these are already established, well-defined, geographical areas. The purpose of the habitat plans will be to provide for the year-long requirements of wildlife in one or more allotments.

10. FWS generally agrees with your statement. All references in the Proposed Action to ripping have been eliminated in the final EIS. All farming along the upper reaches of the Missouri River will be phased out. Shrub planting will only be used in rare instances to establish seed sources. Some burning is proposed to help establish shrubs.

11. FWS agrees and that is why the only introductions in the Proposed Action alternative are for peregrine falcons, black-footed ferrets, swift fox, and bighorn sheep, all indigenous species to north central Montana. None of these will be in pens, and all releases will be to either reintroduce a species not now present on the area or to bolster a flagging population.

12. Providing public hunting is part of goal number 9, page 4 and is again provided for under Recreational Objective number 2 on page 6. Public hunting is again stated as an appropriate use under number 5 on page 9. Obviously, population levels for a certain species will have to be at a level that provides a harvestable surplus for that species in order to permit hunting. Listing that level for each species is beyond the scope of this document.



We agree with your observation that the EIS refers to habitat in the Foreword and other places, but the objectives list numbers of wildlife. Numbers were essential for certain species such as peregrine falcons. Also, the habitat that will support say 10 deer/sq.mi. is an indicator of habitat that will support numerous other wildlife species without listing a certain number for each species.

In general, the EIS deals with habitat, but references are also made to specific wildlife numbers, usually as an indicator of the quality of the habitat desired.

13. The decision to manage in a "generally natural setting" is in accordance with the FWS legislative mandates and policies and precluded further water development except where specifically mentioned in the text. Further, in examination of HEP values compiled on allotments on the refuge, it has been concluded that additional water development would be detrimental to most wildlife species in that it would distribute livestock into areas now used almost exclusively by wildlife and that are needed by wildlife.

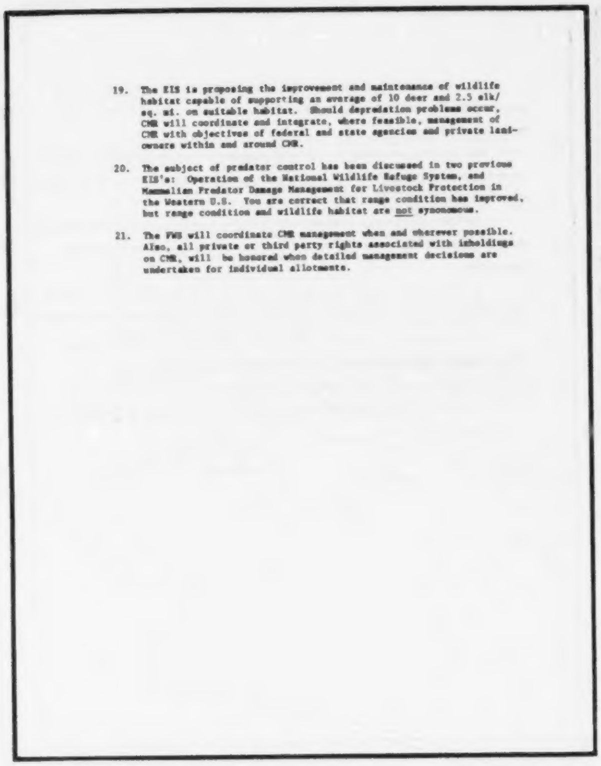
14. Please see revised Wildlife Objective number 8, page 5, which states that between 5,000 and 10,000 acres of prairie dogs will be maintained. Objective number 2, same page, says that ferrets will be introduced as soon as animals are available. Since it is not known when or if any ferrets will be available, it is not known when an introduction will be made.

15. The idea of a Memorandum of Understanding between the Department of State Lands and CMR concerning grazing has merit; we will pursue this matter as we start developing habitat management plans.

16. The EIS does not propose to dramatically increase deer and elk populations. The EIS does propose, however, the improvement and maintenance of habitat capable of supporting an overwintering population of 10 deer/sq.mi. and 2.5 overwintering elk/sq.mi. in suitable habitat (see page 5, wildlife objectives 7 and 9).

17. The statement is somewhat misleading; see revised text page 43, paragraph 2.

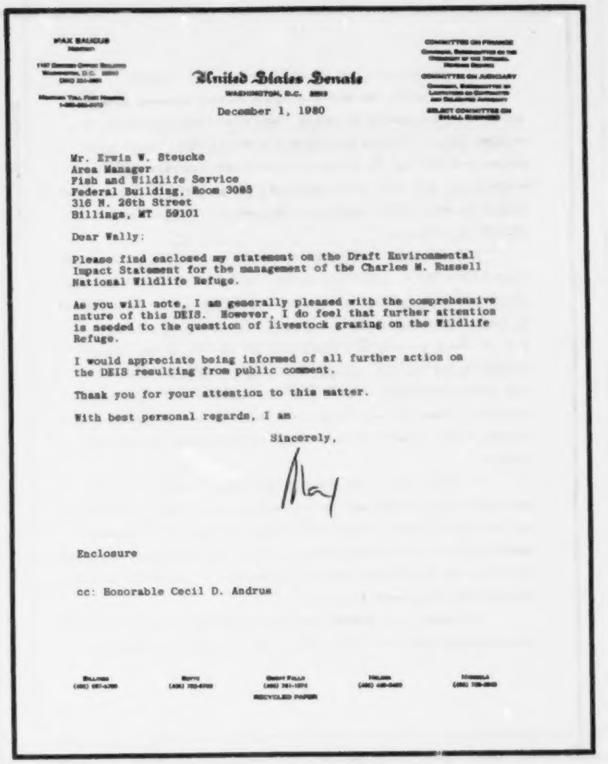
18. The revised livestock economics analysis now takes into account revenue derived from livestock earnings from the CMR. A detailed discussion of livestock economics is provided in Appendix 10. While a few ranchers with high dependency on the CMR will be adversely affected, the FWS does not gather specific information on the other factors you mentioned (indebtedness, etc.) to make a determination of who, if any, ranchers would be forced out of business. This determination depends on sociological as well as economic factors. The EIS does look at the effect of changes in livestock producer spending on the local economy. See Appendix 13 for more discussion on this matter.



19. The EIS is proposing the improvement and maintenance of wildlife habitat capable of supporting an average of 10 deer and 2.5 elk/sq. mi. on suitable habitat. Should depredation problems occur, CMR will coordinate and integrate, where feasible, management of CMR with objectives of federal and state agencies and private landowners within and around CMR.

20. The subject of predator control has been discussed in two previous EIS's: Operation of the National Wildlife Refuge System, and Mammalian Predator Damage Management for Livestock Protection in the Western U.S. You are correct that range condition has improved, but range condition and wildlife habitat are not synonomous.

21. The FWS will coordinate CMR management when and wherever possible. Also, all private or third party rights associated with inholdings on CMR, will be honored when detailed management decisions are undertaken for individual allotments.



MAX BAUCUS

United States Senate
WASHINGTON, D.C.

COMMITTEE ON FINANCE
COMMITTEE ON JUDICIARY
SELECT COMMITTEE ON SMALL BUSINESS

December 1, 1980

Mr. Erwin W. Steucke
Area Manager
Fish and Wildlife Service
Federal Building, Room 3085
316 N. 26th Street
Billings, MT 59101

Dear Wally:

Please find enclosed my statement on the Draft Environmental Impact Statement for the management of the Charles M. Russell National Wildlife Refuge.

As you will note, I am generally pleased with the comprehensive nature of this DEIS. However, I do feel that further attention is needed to the question of livestock grazing on the Wildlife Refuge.

I would appreciate being informed of all further action on the DEIS resulting from public comment.

Thank you for your attention to this matter.

With best personal regards, I am

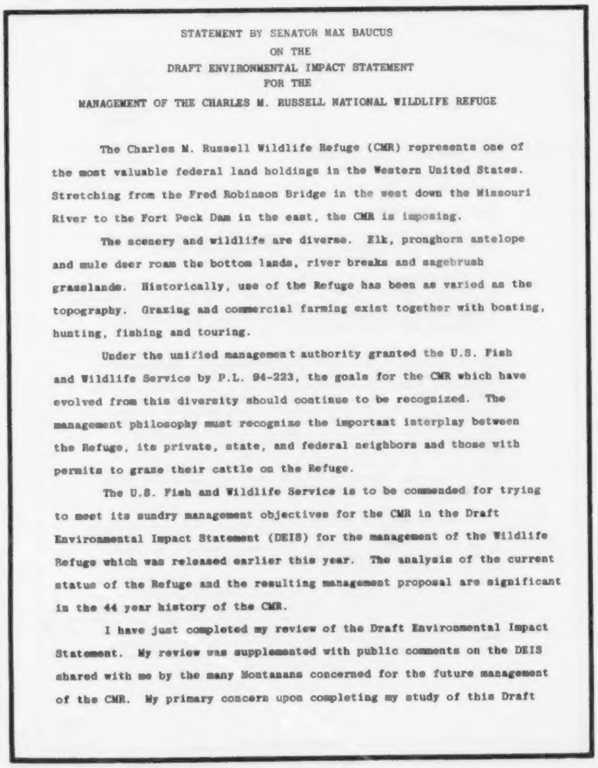
Sincerely,

Max

Enclosure

cc: Honorable Cecil D. Andrus

RECYCLED PAPER



STATEMENT BY SENATOR MAX BAUCUS
ON THE
DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE
MANAGEMENT OF THE CHARLES M. RUSSELL NATIONAL WILDLIFE REFUGE

The Charles M. Russell Wildlife Refuge (CMR) represents one of the most valuable federal land holdings in the Western United States. Stretching from the Fred Robinson Bridge in the west down the Missouri River to the Fort Peck Dam in the east, the CMR is imposing.

The scenery and wildlife are diverse. Elk, pronghorn antelope and mule deer roam the bottom lands, river breaks and sagebrush grasslands. Historically, use of the Refuge has been as varied as the topography. Grazing and commercial farming exist together with boating, hunting, fishing and touring.

Under the unified management authority granted the U.S. Fish and Wildlife Service by P.L. 94-223, the goals for the CMR which have evolved from this diversity should continue to be recognized. The management philosophy must recognize the important interplay between the Refuge, its private, state, and federal neighbors and those with permits to graze their cattle on the Refuge.

The U.S. Fish and Wildlife Service is to be commended for trying to meet its sundry management objectives for the CMR in the Draft Environmental Impact Statement (DEIS) for the management of the Wildlife Refuge which was released earlier this year. The analysis of the current status of the Refuge and the resulting management proposal are significant in the 44 year history of the CMR.

I have just completed my review of the Draft Environmental Impact Statement. My review was supplemented with public comments on the DEIS shared with me by the many Montanans concerned for the future management of the CMR. My primary concern upon completing my study of this Draft

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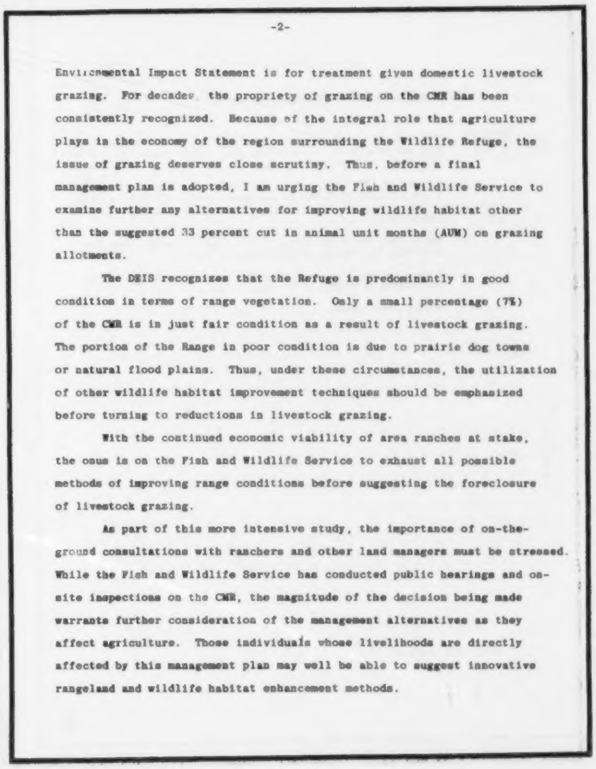

-2-

Environmental Impact Statement is for treatment given domestic livestock grazing. For decades the propriety of grazing on the CMR has been consistently recognized. Because of the integral role that agriculture plays in the economy of the region surrounding the Wildlife Refuge, the issue of grazing deserves close scrutiny. Thus, before a final management plan is adopted, I am urging the Fish and Wildlife Service to examine further any alternatives for improving wildlife habitat other than the suggested 33 percent cut in animal unit months (AUM) on grazing allotments.

The DEIS recognizes that the Refuge is predominantly in good condition in terms of range vegetation. Only a small percentage (7%) of the CMR is in just fair condition as a result of livestock grazing. The portion of the Range in poor condition is due to prairie dog towns or natural flood plains. Thus, under these circumstances, the utilization of other wildlife habitat improvement techniques should be emphasized before turning to reductions in livestock grazing.

With the continued economic viability of area ranches at stake, the onus is on the Fish and Wildlife Service to exhaust all possible methods of improving range conditions before suggesting the foreclosure of livestock grazing.

As part of this more intensive study, the importance of on-the-ground consultations with ranchers and other land managers must be stressed. While the Fish and Wildlife Service has conducted public hearings and on-site inspections on the CMR, the magnitude of the decision being made warrants further consideration of the management alternatives as they affect agriculture. Those individuals whose livelihoods are directly affected by this management plan may well be able to suggest innovative rangeland and wildlife habitat enhancement methods.

-3-

Specifically, the economic impact of this proposed management system deserves greater attention. While the DEIS notes that, on a regional basis, the loss of income is insignificant, common sense argues that the loss of 20,000 AUM's will have real and disastrous consequences for those stockgrowers who are primarily affected. Such an abrupt departure from longstanding management practices must not be entered into lightly.

The additional study I am requesting does not deny the primary focus of the CMR as a wildlife refuge. By virtue of the designation of the area as a refuge, the mission of the Fish and Wildlife Service to protect wildlife habitat is apparent. However, my contention is that livestock grazing is a compatible use for the Refuge. Special protection for riparian regions, soil ripping, controlled burns, cooperative management efforts with area ranchers, and other novel management practices can, in my mind, result in the continuation of grazing at near present levels without serious damage to wildlife habitat.

For their part, area ranchers have long recognized that the protection of the range quality and habitat of the CMR is critical for the long-term success of their operations. Through more intensive consultations, the Fish and Wildlife Service can underscore the necessity for sound and cooperative management practices to ensure the retention of individual allotments on the CMR.

In summary, I recommend the following modifications be made in the management plan for the Charles M. Russell Wildlife Refuge:

-4-

1. Alternative methods for the enhancement of wildlife habitat and rangelands should be explored more fully rather than relying upon cutbacks in AUM's.

2. Increased consultation and cooperation with adjacent property owners and area residents should be emphasized in formulating a management plan for the CMR.

3. The management plan should provide flexibility in implementing any management plan to avoid sudden economic dislocation for grazing permitees.

4. The DEIS should be supplemented to more specifically identify the economic impacts of livestock grazing cuts on the surrounding region.

In conclusion, I am convinced that habitat for wildlife can be significantly enhanced without the unfortunate consequences for the area that would result from grazing cutbacks amounting to 33 percent. I stand ready to lend whatever legislative assistance may be necessary to accomplish this end.

Response to U.S. Senator Baucus

1. The economic impact has been reevaluated and the EIS revised (see text and Appendices) to more accurately reflect the economic situation under various alternatives.

2. In the pre-EIS studies, it was determined that current grazing was a primary limiting factor on the enhancement of wildlife habitats on CMR; hence, the alternatives were developed around grazing modifications.

3. Public involvement has been, and will continue to be, emphasized regarding the planning and management of CMR.

4. A phase-in period has been planned to reduce impacts of a sudden dislocation in grazing permittees.

5. See response 1 above.

United States Senate

September 29, 1980

The Honorable Cecil D. Andrus
Secretary of the Interior
Interior Building
Washington, D. C. 20240

Dear Mr. Secretary:

We have just completed a review of your Draft Environmental Impact Statement (DEIS) on Management of the Charles M. Russell National Wildlife Refuge.

The proposals and direction portrayed in the document give us a great deal of concern. While we recognize the reason for preparation of the document by the Fish and Wildlife Service, we believe the alternatives presented fall far short of addressing the issues in need of resolution.

We are in total disagreement with treatment given domestic livestock grazing in the draft alternatives. The Executive Order establishing the Fort Peck Game Range in 1936 clearly recognized domestic livestock grazing as a compatible use on the Game Range. While subsequent legislation placed CMR management completely under the Fish and Wildlife Service, it did not direct that grazing use by domestic livestock be diminished or eliminated or that there were unresolvable conflicts between wildlife and domestic livestock use. The material presented in the DEIS does not present conflicts that cannot be resolved with some minor changes in direction regarding range improvements and some changes in the rather arbitrary goals and objectives outlined on pages 4 and 5 of the document.

Overall range condition in the Refuge is in exceedingly good condition and, with some minor exceptions, there appears to be little conflict between domestic livestock and those classes of wildlife where direct competition for the grazing resource would be expected.

Another shortcoming in the document that we find exceedingly disturbing is the socio-economic treatment given to the grazing reduction impact. The document states that the regional economic effect due to grazing reductions would be insignificant under any of the alternatives. However, in the section assessing the consequences of the proposed action the authors

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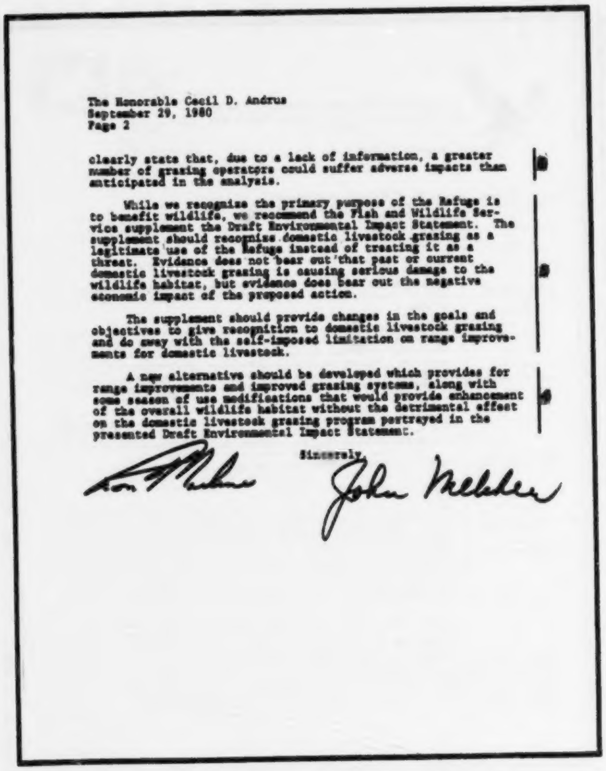


The Honorable Cecil D. Andrus
September 29, 1980
Page 2

clearly state that, due to a lack of information, a greater number of grazing operators could suffer adverse impacts than anticipated in the analysis.

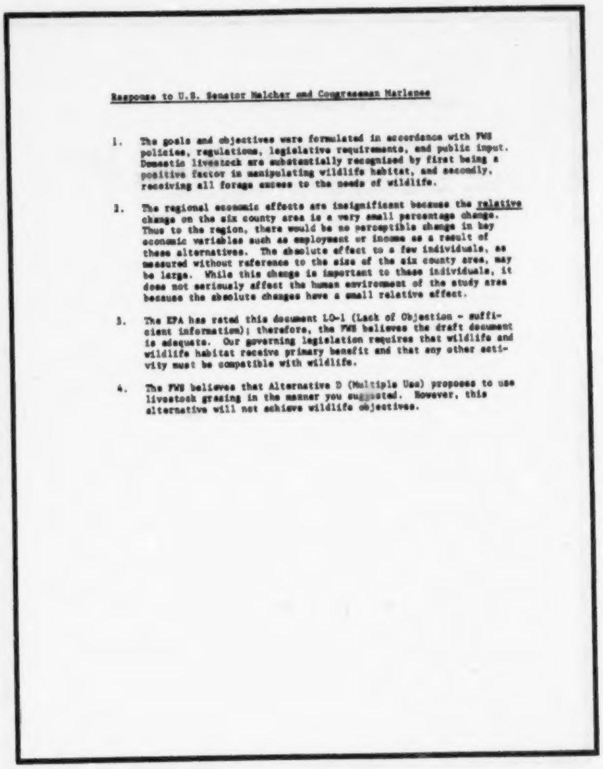
While we recognize the primary purpose of the Refuge is to benefit wildlife, we recommend the Fish and Wildlife Service supplement the Draft Environmental Impact Statement. The supplement should recognize domestic livestock grazing as a legitimate use of the Refuge instead of treating it as a threat. Evidence does not bear out that past or current domestic livestock grazing is causing serious damage to the wildlife habitat, but evidence does bear out the negative economic impact of the proposed action.

The supplement should provide changes in the goals and objectives to give recognition to domestic livestock grazing and do away with the self-imposed limitation on range improvements for domestic livestock.

A new alternative should be developed which provides for range improvements and improved grazing systems, along with some season of use modifications that would provide enhancement of the overall wildlife habitat without the detrimental effect on the domestic livestock grazing program portrayed in the presented Draft Environmental Impact Statement.

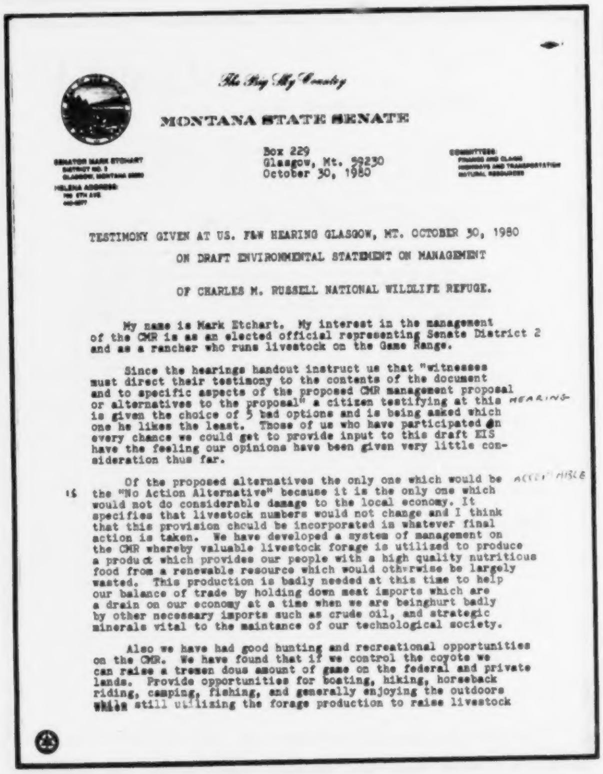
Sincerely,

John Melcher



Response to U.S. Senator Melcher and Congressman Marlenee

1. The goals and objectives were formulated in accordance with FWS policies, regulations, legislative requirements, and public input. Domestic livestock are substantially recognized by first being a positive factor in manipulating wildlife habitat, and secondly, receiving all forage excess to the needs of wildlife.
2. The regional economic effects are insignificant because the relative change on the six county area is a very small percentage change. Thus to the region, there would be no perceptible change in key economic variables such as employment or income as a result of these alternatives. The absolute effect to a few individuals, as measured without reference to the size of the six county area, may be large. While this change is important to these individuals, it does not seriously affect the human environment of the study area because the absolute changes have a small relative effect.
3. The EPA has rated this document LO-1 (Lack of Objection - sufficient information); therefore, the FWS believes the draft document is adequate. Our governing legislation requires that wildlife and wildlife habitat receive primary benefit and that any other activity must be compatible with wildlife.
4. The FWS believes that Alternative D (Multiple Use) proposes to use livestock grazing in the manner you suggested. However, this alternative will not achieve wildlife objectives.



The Big Sky Country

MONTANA STATE SENATE

SENATOR MARK ETCHART
HELENA ADDRESS:

Box 229
Glasgow, Mt. 59230
October 30, 1980

COMMITTEES:

TESTIMONY GIVEN AT US. F&W HEARING GLASGOW, MT. OCTOBER 30, 1980

ON DRAFT ENVIRONMENTAL STATEMENT ON MANAGEMENT

OF CHARLES M. RUSSELL NATIONAL WILDLIFE REFUGE.

My name is Mark Etchart. My interest in the management of the CMR is as an elected official representing Senate District 2 and as a rancher who runs livestock on the Game Range.

Since the hearings handout instruct us that "witnesses must direct their testimony to the contents of the document and to specific aspects of the proposed CMR management proposal or alternatives to the proposal" a citizen testifying at this HEARING is given the choice of 5 bad options and is being asked which one he likes the least. Those of us who have participated on every chance we could get to provide input to this draft EIS have the feeling our opinions have been given very little consideration thus far.

15 Of the proposed alternatives the only one which would be ACCEPTABLE the "No Action Alternative" because it is the only one which would not do considerable damage to the local economy. It specifies that livestock numbers would not change and I think that this provision chould be incorporated in whatever final action is taken. We have developed a system of management on the CMR whereby valuable livestock forage is utilized to produce a product which provides our people with a high quality nutritious food from a renewable resource which would otherwise be largely wasted. This production is badly needed at this time to help our balance of trade by holding down meat imports which are a drain on our economy at a time when we are beinghurt badly by other necessary imports such as crude oil, and strategic minerals vital to the maintance of our technological society.

Also we have had good hunting and recreational opportunities on the CMR. We have found that if we control the coyote we can raise a tremen dous amount of game on the federal and private lands. Provide opportunities for boating, hiking, horseback riding, camping, fishing, and generally enjoying the outdoors while still utilizing the forage production to raise livestock

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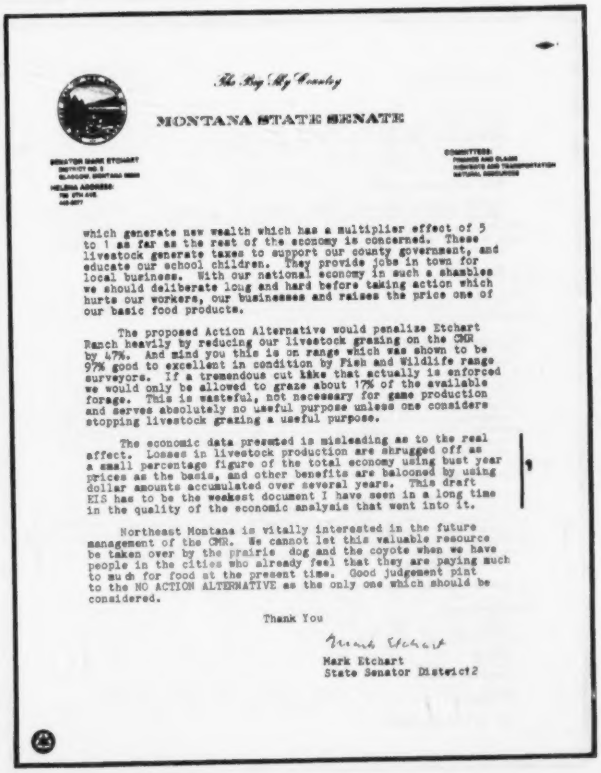


The Big Sky Country

MONTANA STATE SENATE

SENATOR MARK ETCHART
HELENA ADDRESS:

COMMITTEES:

which generate new wealth which has a multiplier effect of 5 to 1 as far as the rest of the economy is concerned. These livestock generate taxes to support our county government, and educate our school children. They provide jobs in town for local business. With our national economy in such a shambles we should deliberate long and hard before taking action which hurts our workers, our businesses and raises the price one of our basic food products.

The proposed Action Alternative would penalize Etchart Ranch heavily by reducing our livestock grazing on the CMR by 47%. And mind you this is on range which was shown to be 97% good to excellent in condition by Fish and Wildlife range surveyors. If a tremendous cut like that actually is enforced we would only be allowed to graze about 17% of the available forage. This is wasteful, not necessary for game production and serves absolutely no useful purpose unless one considers stopping livestock grazing a useful purpose.

The economic data presented is misleading as to the real affect. Losses in livestock production are shrugged off as a small percentage figure of the total economy using bust year prices as the basis, and other benefits are balooned by using dollar amounts accumulated over several years. This draft EIS has to be the weakest document I have seen in a long time in the quality of the economic analysis that went into it. 9

Northeast Montana is vitally interested in the future management of the CMR. We cannot let this valuable resource be taken over by the prairie dog and the coyote when we have people in the cities who already feel that they are paying much to much for food at the present time. Good judgement pint to the NO ACTION ALTERNATIVE as the only one which should be considered.

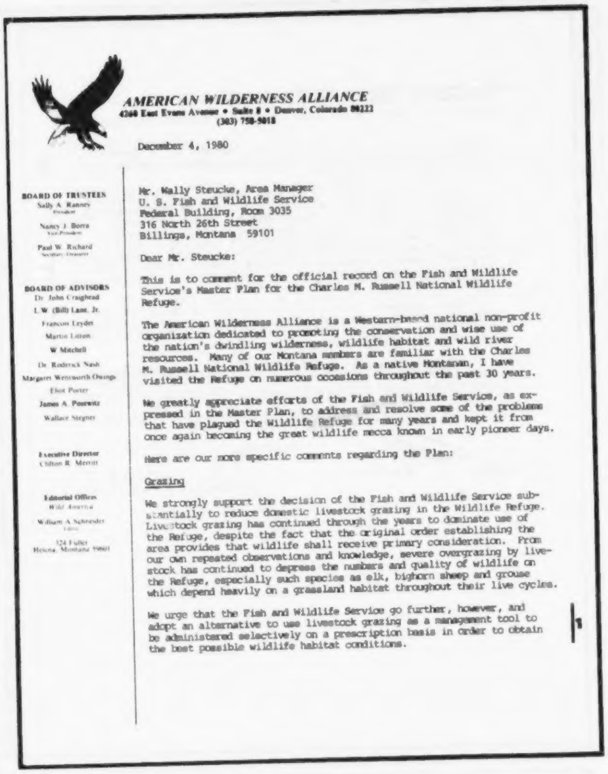
Thank You

Mark Etchart

Mark Etchart
State Senator District 2

Response to Montana State Senator Etchart

1. The regional economic effects are insignificant because the relative change on the six county area is a very small percentage change. The absolute effect to a few individuals, as measured without reference to the six county area, may be large. See also the revised economic evaluation in the text and appendices.



AMERICAN WILDERNESS ALLIANCE
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December 4, 1980

Mr. Wally Steucke, Area Manager
U. S. Fish and Wildlife Service
Federal Building, Room 3035
316 North 26th Street
Billings, Montana 59101

Dear Mr. Steucke:

This is to comment for the official record on the Fish and Wildlife Service's Master Plan for the Charles M. Russell National Wildlife Refuge.

The American Wilderness Alliance is a Western-based national non-profit organization dedicated to promoting the conservation and wise use of the nation's dwindling wilderness, wildlife habitat and wild river resources. Many of our Montana members are familiar with the Charles M. Russell National Wildlife Refuge. As a native Montanan, I have visited the Refuge on numerous occasions throughout the past 30 years.

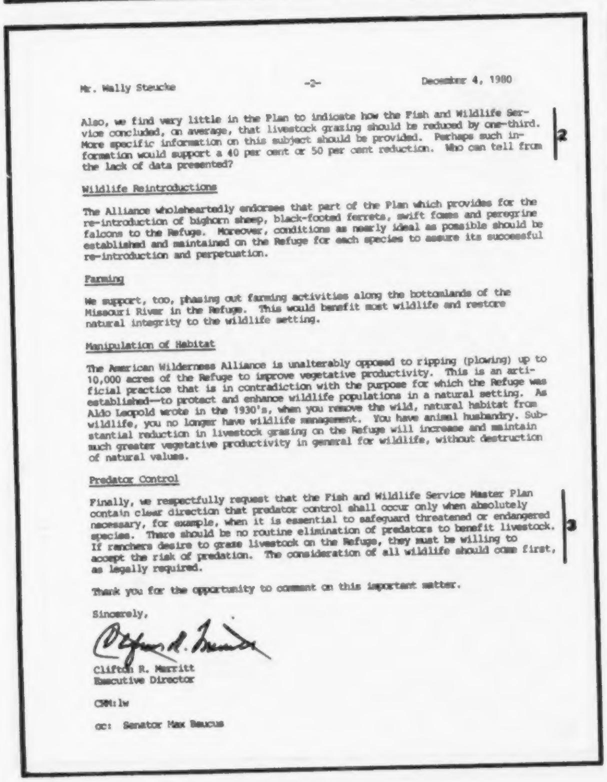
We greatly appreciate efforts of the Fish and Wildlife Service, as expressed in the Master Plan, to address and resolve some of the problems that have plagued the Wildlife Refuge for many years and kept it from once again becoming the great wildlife mecca known in early pioneer days.

Here are our more specific comments regarding the Plan:

Grazing

We strongly support the decision of the Fish and Wildlife Service substantially to reduce domestic livestock grazing in the Wildlife Refuge. Livestock grazing has continued through the years to dominate use of the Refuge, despite the fact that the original order establishing the area provides that wildlife shall receive primary consideration. From our own repeated observations and knowledge, severe overgrazing by livestock has continued to depress the numbers and quality of wildlife on the Refuge, especially such species as elk, bighorn sheep and grouse which depend heavily on a grassland habitat throughout their live cycles.

We urge that the Fish and Wildlife Service go further, however, and adopt an alternative to use livestock grazing as a management tool to be administered selectively on a prescription basis in order to obtain the best possible wildlife habitat conditions. 1



Mr. Wally Steucke -2- December 4, 1980

Also, we find very little in the Plan to indicate how the Fish and Wildlife Service concluded, on average, that livestock grazing should be reduced by one-third. More specific information on this subject should be provided. Perhaps such information would support a 40 per cent or 50 per cent reduction. Who can tell from the lack of data presented? 2

Wildlife Reintroductions

The Alliance wholeheartedly endorses that part of the Plan which provides for the re-introduction of bighorn sheep, black-footed ferrets, swift foxes and peregrine falcons to the Refuge. Moreover, conditions as nearly ideal as possible should be established and maintained on the Refuge for each species to assure its successful re-introduction and perpetuation.

Farming

We support, too, phasing out farming activities along the bottomlands of the Missouri River in the Refuge. This would benefit most wildlife and restore natural integrity to the wildlife setting.

Manipulation of Habitat

The American Wilderness Alliance is unalterably opposed to ripping (plowing) up to 10,000 acres of the Refuge to improve vegetative productivity. This is an artificial practice that is in contradiction with the purpose for which the Refuge was established—to protect and enhance wildlife populations in a natural setting. As Aldo Leopold wrote in the 1930's, when you remove the wild, natural habitat from wildlife, you no longer have wildlife management. You have animal husbandry. Substantial reduction in livestock grazing on the Refuge will increase and maintain much greater vegetative productivity in general for wildlife, without destruction of natural values.

Predator Control

Finally, we respectfully request that the Fish and Wildlife Service Master Plan contain clear direction that predator control shall occur only when absolutely necessary, for example, when it is essential to safeguard threatened or endangered species. There should be no routine elimination of predators to benefit livestock. If ranchers desire to graze livestock on the Refuge, they must be willing to accept the risk of predation. The consideration of all wildlife should come first, as legally required. 3

Thank you for the opportunity to comment on this important matter.

Sincerely,

Clifton R. Merritt
Executive Director

CRM:lw

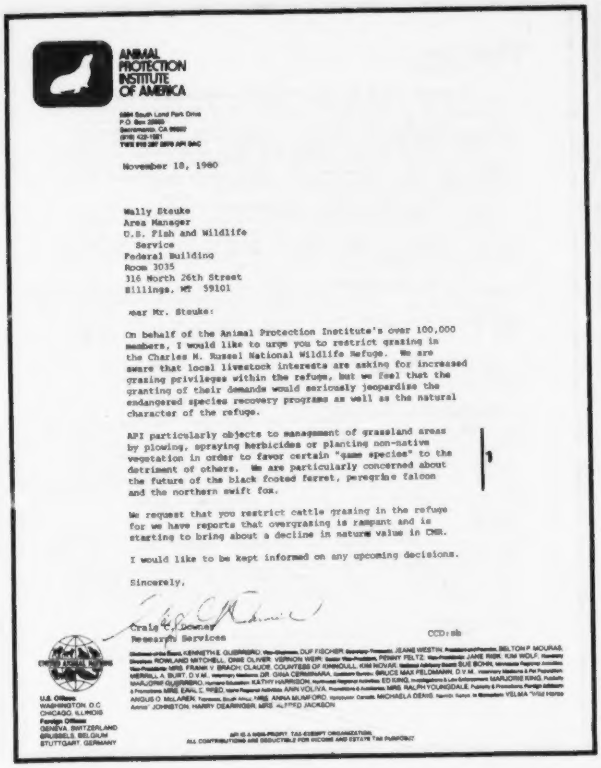
cc: Senator Max Baucus

Response to American Wilderness Alliance

1. Grazing is to be used as a management tool under the Proposed Action. Each allotment will be evaluated and grazing prescribed to achieve desired habitat responses. The Intensive Wildlife Management alternative also specifically provides for prescription grazing to benefit wildlife.

2. The amount of forage available to livestock was computed on a section-by-section basis. Since there are over 1,000 sections on CMR, a listing of the tabulation of each is beyond the scope of this document. The 32.6 percent reduction is an average of the reductions applied to these sections. See revised Appendix 15. This amount of reduction generally fulfilled the requirements for wildlife (see Appendix 1b).

3. Preventive predator control or wholesale control are prohibited on CMR. Control of the offending predator is, however, permitted on CMR upon documentation by Animal Damage Control personnel.



ANIMAL
PROTECTION
INSTITUTE
OF AMERICA

November 18, 1980

Wally Steuke
Area Manager
U.S. Fish and Wildlife
  Service
Federal Building
Room 3035
316 North 26th Street
Billings, MT 59101

Dear Mr. Steuke:

On behalf of the Animal Protection Institute's over 100,000 members, I would like to urge you to restrict grazing in the Charles M. Russel National Wildlife Refuge. We are aware that local livestock interests are asking for increased grazing privileges within the refuge, but we feel that the granting of their demands would seriously jeopardize the endangered species recovery programs as well as the natural character of the refuge.

API particularly objects to management of grassland areas by plowing, spraying herbicides or planting non-native vegetation in order to favor certain "game species" to the detriment of others. We are particularly concerned about the future of the black footed ferret, peregrine falcon and the northern swift fox. 1

We request that you restrict cattle grazing in the refuge for we have reports that overgrazing is rampant and is starting to bring about a decline in nature value in CMR.

I would like to be kept informed on any upcoming decisions.

Sincerely,

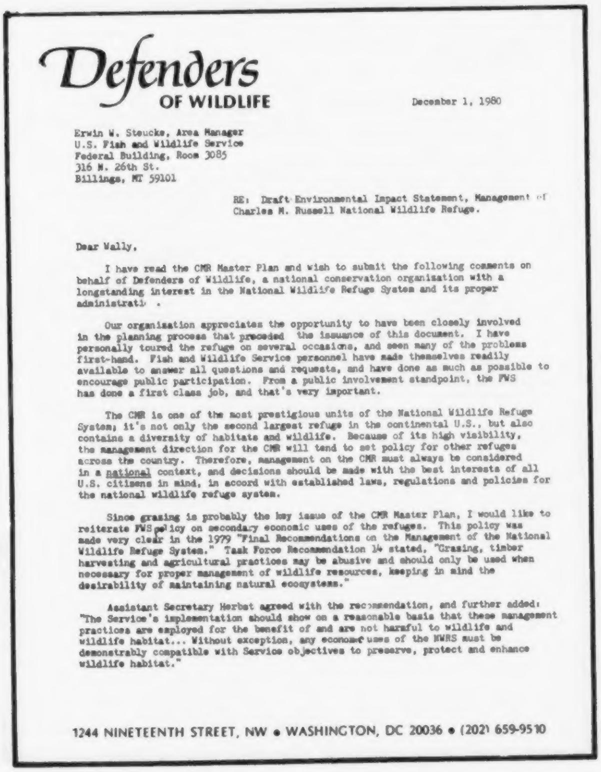
Craig C. Downer
Research Services

CCD:sb

U.S. Offices
WASHINGTON, D.C.
CHICAGO, ILLINOIS
Foreign Offices
GENEVA, SWITZERLAND
BRUSSELS, BELGIUM
STUTTGART, GERMANY

Response to Animal Protection Institute

1. During the habitat evaluation phase of the planning process, it became apparent that many species had similar habitat requirements. Rather than selecting an animal with little literature available and not easily recognized by the public, game species were selected, among others. The habitat components necessary for these animals also fit the habitat components necessary for a large number of non-game wildlife also.



Defenders
OF WILDLIFE

December 1, 1980

Erwin W. Steucke, Area Manager
U.S. Fish and Wildlife Service
Federal Building, Room 3085
316 N. 26th St.
Billings, MT 59101

RE: Draft Environmental Impact Statement, Management of Charles M. Russell National Wildlife Refuge.

Dear Wally,

I have read the CMR Master Plan and wish to submit the following comments on behalf of Defenders of Wildlife, a national conservation organization with a longstanding interest in the National Wildlife Refuge System and its proper administration.

Our organization appreciates the opportunity to have been closely involved in the planning process that preceded the issuance of this document. I have personally toured the refuge on several occasions, and seen many of the problems first-hand. Fish and Wildlife Service personnel have made themselves readily available to answer all questions and requests, and have done as much as possible to encourage public participation. From a public involvement standpoint, the FWS has done a first class job, and that's very important.

The CMR is one of the most prestigious units of the National Wildlife Refuge System; it's not only the second largest refuge in the continental U.S., but also contains a diversity of habitats and wildlife. Because of its high visibility, the management direction for the CMR will tend to set policy for other refuges across the country. Therefore, management on the CMR must always be considered in a national context, and decisions should be made with the best interests of all U.S. citizens in mind, in accord with established laws, regulations and policies for the national wildlife refuge system.

Since grazing is probably the key issue of the CMR Master Plan, I would like to reiterate FWS policy on secondary economic uses of the refuges. This policy was made very clear in the 1979 "Final Recommendations on the Management of the National Wildlife Refuge System." Task Force Recommendation 14 stated, "Grazing, timber harvesting and agricultural practices may be abusive and should only be used when necessary for proper management of wildlife resources, keeping in mind the desirability of maintaining natural ecosystems."

Assistant Secretary Herbst agreed with the recommendation, and further added: "The Service's implementation should show on a reasonable basis that these management practices are employed for the benefit of and are not harmful to wildlife and wildlife habitat... Without exception, any economic uses of the NWRS must be demonstrably compatible with Service objectives to preserve, protect and enhance wildlife habitat."

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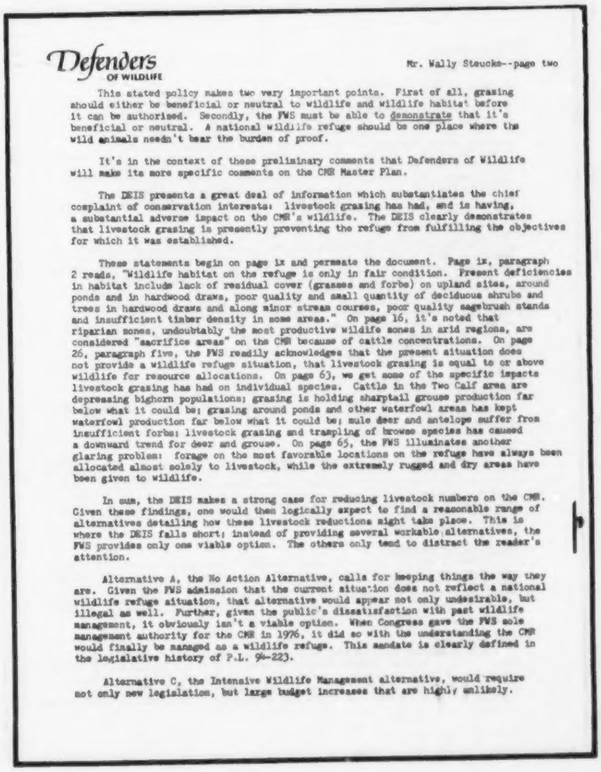


This stated policy makes two very important points. First of all, grazing should either be beneficial or neutral to wildlife and wildlife habitat before it can be authorized. Secondly, the FWS must be able to demonstrate that it's beneficial or neutral. A national wildlife refuge should be one place where the wild animals needn't bear the burden of proof.

It's in the context of these preliminary comments that Defenders of Wildlife will make its more specific comments on the CMR Master Plan.

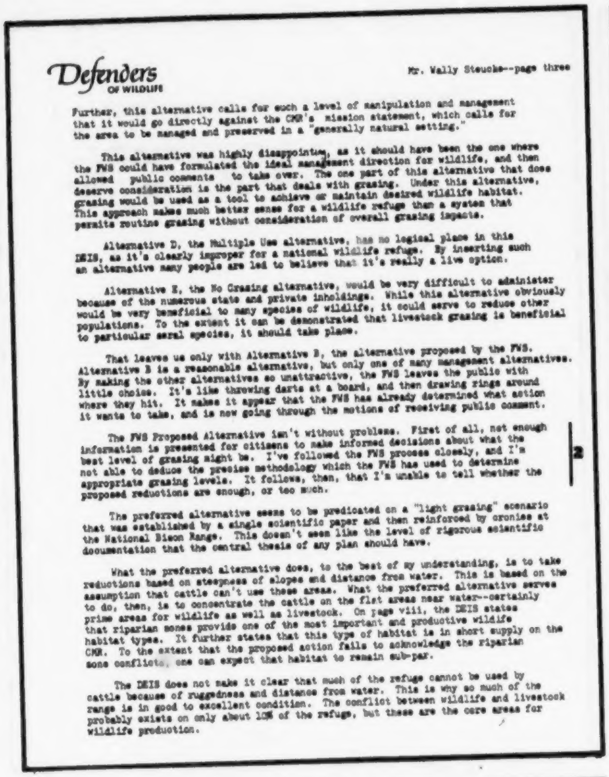
The DEIS presents a great deal of information which substantiates the chief complaint of conservation interests: livestock grazing has had, and is having, a substantial adverse impact on the CMR's wildlife. The DEIS clearly demonstrates that livestock grazing is presently preventing the refuge from fulfilling the objectives for which it was established.

These statements begin on page ix and permeate the document. Page ix, paragraph 2 reads, "Wildlife habitat on the refuge is only in fair condition. Present deficiencies in habitat include lack of residual cover (grasses and forbs) on upland sites, around ponds and in hardwood draws, poor quality and small quantity of deciduous shrubs and trees in hardwood draws and along minor stream courses, poor quality sagebrush stands and insufficient timber density in some areas." On page 16, it's noted that riparian zones, undoubtably the most productive wildife zones in arid regions, are considered "sacrifice areas" on the CMR because of cattle concentrations. On page 26, paragraph five, the FWS readily acknowledges that the present situation does not provide a wildlife refuge situation, that livestock grazing is equal to or above wildlife for resource allocations. On page 63, we get some of the specific impacts livestock grazing has had on individual species. Cattle in the Two Calf area are depressing bighorn populations; grazing is holding sharptail grouse production far below what it could be; grazing around ponds and other waterfowl areas has kept waterfowl production far below what it could be; mule deer and antelope suffer from insufficient forbs; livestock grazing and trampling of browse species has caused a downward trend for deer and grouse. On page 65, the FWS illuminates another glaring problem: forage on the most favorable locations on the refuge have always been allocated almost solely to livestock, while the extremely rugged and dry areas have been given to wildlife.

In sum, the DEIS makes a strong case for reducing livestock numbers on the CMR. Given these findings, one would then logically expect to find a reasonable range of alternatives detailing how these livestock reductions might take place. This is where the DEIS falls short; instead of providing several workable alternatives, the FWS provides only one viable option. The others only tend to distract the reader's attention. 1

Alternative A, the No Action Alternative, calls for keeping things the way they are. Given the FWS admission that the current situation does not reflect a national wildlife refuge situation, that alternative would appear not only undesirable, but illegal as well. Further, given the public's dissatisfaction with past wildlife management, it obviously isn't a viable option. When Congress gave the FWS sole management authority for the CMR in 1976, it did so with the understanding the CMR would finally be managed as a wildlife refuge. This mandate is clearly defined in the legislative history of P.L. 94-223.

Alternative C, the Intensive Wildlife Management alternative, would require not only new legislation, but large budget increases that are highly unlikely.



Further, this alternative calls for such a level of manipulation and management that it would go directly against the CMR's mission statement, which calls for the area to be managed and preserved in a "generally natural setting."

This alternative was highly disappointing, as it should have been the one where the FWS could have formulated the ideal management direction for wildlife, and then allowed public comments to take over. The one part of this alternative that does deserve consideration is the part that deals with grazing. Under this alternative, grazing would be used as a tool to achieve or maintain desired wildlife habitat. This approach makes much better sense for a wildlife refuge than a system that permits routine grazing without consideration of overall grazing impacts.

Alternative D, the Multiple Use alternative, has no logical place in this DEIS, as it's clearly improper for a national wildlife refuge. By inserting such an alternative many people are led to believe that it's really a live option.

Alternative E, the No Grazing alternative, would be very difficult to administer because of the numerous state and private inholdings. While this alternative obviously would be very beneficial to many species of wildlife, it could serve to reduce other populations. To the extent it can be demonstrated that livestock grazing is beneficial to particular seral species, it should take place.

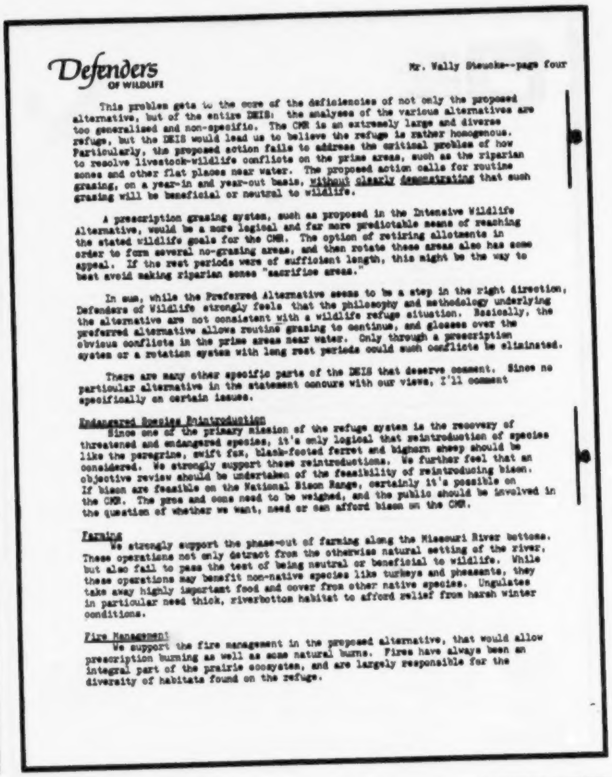
That leaves us only with Alternative B, the alternative proposed by the FWS. Alternative B is a reasonable alternative, but only one of many management alternatives. By making the other alternatives so unattractive, the FWS leaves the public with little choice. It's like throwing darts at a board, and then drawing rings around where they hit. It makes it appear that the FWS has already determined what action it wants to take, and is now going through the motions of receiving public comment.

The FWS Proposed Alternative isn't without problems. First of all, not enough information is presented for citizens to make informed decisions about what the best level of grazing might be. I've followed the FWS process closely, and I'm not able to deduce the precise methodology which the FWS has used to determine appropriate grazing levels. It follows, then, that I'm unable to tell whether the proposed reductions are enough, or too much. 2

The preferred alternative seems to be predicated on a "light grazing" scenario that was established by a single scientific paper and then reinforced by cronies at the National Bison Range. This doesn't seem like the level of rigorous scientific documentation that the central thesis of any plan should have.

What the preferred alternative does, to the best of my understanding, is to take reductions based on steepness of slopes and distance from water. This is based on the assumption that cattle can't use these areas. What the preferred alternative serves to do, then, is to concentrate the cattle on the flat areas near water--certainly prime areas for wildlife as well as livestock. On page viii, the DEIS states that riparian zones provide one of the most important and productive wildlife habitat types. It further states that this type of habitat is in short supply on the CMR. To the extent that the proposed action fails to acknowledge the riparian zone conflicts, one can expect that habitat to remain sub-par.

The DEIS does not make it clear that much of the refuge cannot be used by cattle because of ruggedness and distance from water. This is why so much of the range is in good to excellent condition. The conflict between wildlife and livestock probably exists on only about 10% of the refuge, but these are the core areas for wildlife production.



This problem gets to the core of the deficiencies of not only the proposed alternative, but of the entire DEIS: the analyses of the various alternatives are too generalized and non-specific. The CMR is an extremely large and diverse refuge, but the DEIS would lead us to believe the refuge is rather homogenous. Particularly, the proposed action fails to address the critical problem of how to resolve livestock-wildlife conflicts on the prime areas, such as the riparian zones and other flat places near water. The proposed action calls for routine grazing, on a year-in and year-out basis, without clearly demonstrating that such grazing will be beneficial or neutral to wildlife. 3

A prescription grazing system, such as proposed in the Intensive Wildlife Alternative, would be a more logical and far more predictable means of reaching the stated wildlife goals for the CMR. The option of retiring allotments in order to form several no-grazing areas, and then rotate these areas also has some appeal. If the rest periods were of sufficient length, this might be the way to best avoid making riparian zones "sacrifice areas."

In sum, while the Preferred Alternative seems to be a step in the right direction, Defenders of Wildlife strongly feels that the philosophy and methodology underlying the alternative are not consistent with a wildlife refuge situation. Basically, the preferred alternative allows routine grazing to continue, and glosses over the obvious conflicts in the prime areas near water. Only through a prescription system or a rotation system with long rest periods could such conflicts be eliminated.

There are many other specific parts of the DEIS that deserve comment. Since no particular alternative in the statement concurs with our views, I'll comment specifically on certain issues.

Endangered Species Reintroduction

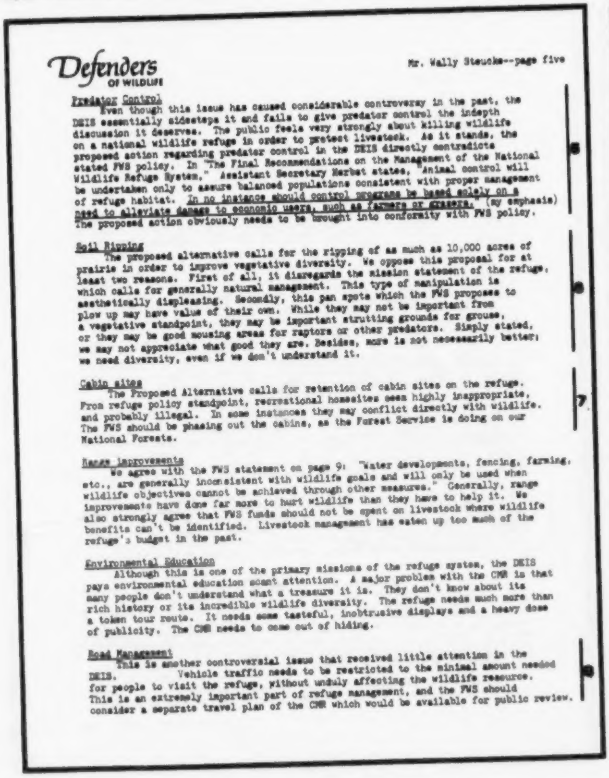
Since one of the primary mission of the refuge system is the recovery of threatened and endangered species, it's only logical that reintroduction of species like the peregrine, swift fox, black-footed ferret and bighorn sheep should be considered. We strongly support these reintroductions. We further feel that an objective review should be undertaken of the feasibility of reintroducing bison. If bison are feasible on the National Bison Range, certainly it's possible on the CMR. The pros and cons need to be weighed, and the public should be involved in the question of whether we want, need or can afford bison on the CMR. 4

Farming

We strongly support the phase-out of farming along the Missouri River bottoms. These operations not only detract from the otherwise natural setting of the river, but also fail to pass the test of being neutral or beneficial to wildlife. While these operations may benefit non-native species like turkeys and pheasants, they take away highly important food and cover from other native species. Ungulates in particular need thick, riverbottom habitat to afford relief from harsh winter conditions.

Fire Management

We support the fire management in the proposed alternative, that would allow prescription burning as well as some natural burns. Fires have always been an integral part of the prairie ecosystem, and are largely responsible for the diversity of habitats found on the refuge.



Predator Control

Even though this issue has caused considerable controversy in the past, the DEIS essentially sidesteps it and fails to give predator control the indepth discussion it deserves. The public feels very strongly about killing wildlife on a national wildlife refuge in order to protect livestock. As it stands, the proposed action regarding predator control in the DEIS directly contradicts stated FWS policy. In "The Final Recommendations on the Management of the National Wildlife Refuge System," Assistant Secretary Herbst states, "Animal control will be undertaken only to assure balanced populations consistent with proper management of refuge habitat. In no instance should control programs be based solely on a need to alleviate damage to economic users, such as farmers or grazers." (my emphasis) The proposed action obviously needs to be brought into conformity with FWS policy. 5

Soil Ripping

The proposed alternative calls for the ripping of as much as 10,000 acres of prairie in order to improve vegetative diversity. We oppose this proposal for at least two reasons. First of all, it disregards the mission statement of the refuge, which calls for generally natural management. This type of manipulation is aesthetically displeasing. Secondly, this pan spots which the FWS proposes to plow up may have value of their own. While they may not be important from a vegetative standpoint, they may be important strutting grounds for grouse, or they may be good mousing areas for raptors or other predators. Simply stated, we may not appreciate what good they are. Besides, more is not necessarily better; we need diversity, even if we don't understand it. 6

Cabin sites

The Proposed Alternative calls for retention of cabin sites on the refuge. From refuge policy standpoint, recreational homesites seem highly inappropriate, and probably illegal. In some instances they may conflict directly with wildlife. The FWS should be phasing out the cabins, as the Forest Service is doing on our National Forests. 7

Range improvements

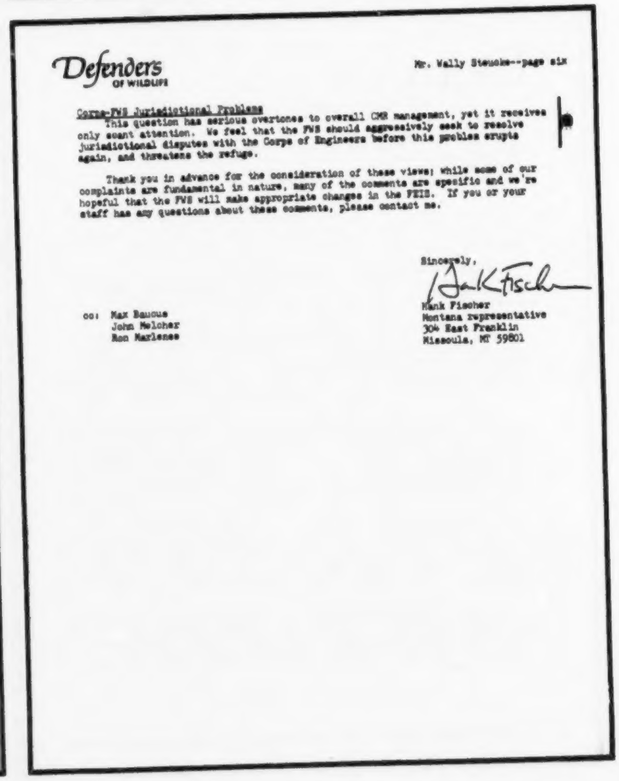
We agree with the FWS statement on page 9: "Water developments, fencing, farming, etc., are generally inconsistent with wildlife goals and will only be used when wildlife objectives cannot be achieved through other measures." Generally, range improvements have done far more to hurt wildlife than they have to help it. We also strongly agree that FWS funds should not be spent on livestock where wildlife benefits can't be identified. Livestock management has eaten up too much of the refuge's budget in the past.

Environmental Education

Although this is one of the primary missions of the refuge system, the DEIS pays environmental education scant attention. A major problem with the CMR is that many people don't understand what a treasure it is. They don't know about its rich history or its incredible wildlife diversity. The refuge needs much more than a token tour route. It needs some tasteful, inobtrusive displays and a heavy dose of publicity. The CMR needs to come out of hiding.

Road Management

This is another controversial issue that received little attention in the DEIS. Vehicle traffic needs to be restricted to the minimal amount needed for people to visit the refuge, without unduly affecting the wildlife resource. This is an extremely important part of refuge management, and the FWS should consider a separate travel plan of the CMR which would be available for public review. 8



Corps-FWS Jurisdictional Problems

This question has serious overtones to overall CMR management, yet it receives only scant attention. We feel that the FWS should aggressively seek to resolve jurisdictional disputes with the Corps of Engineers before this problem erupts again, and threatens the refuge. 9

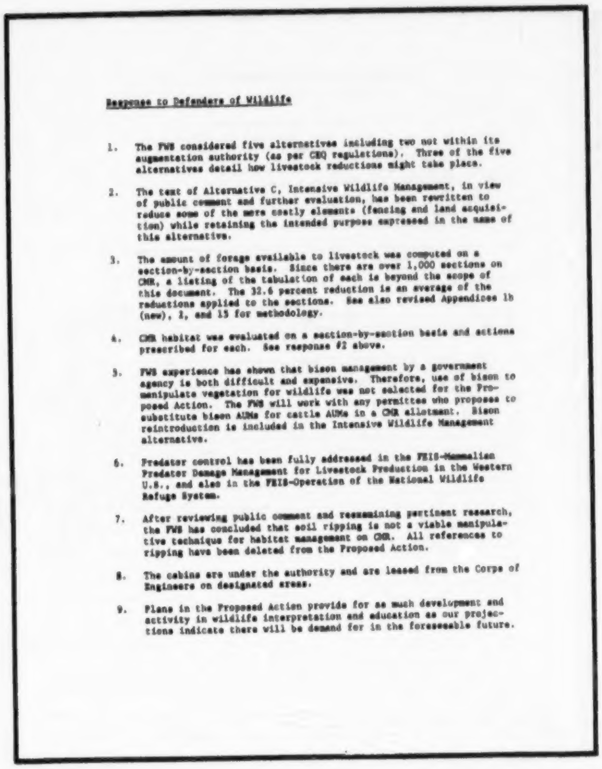
Thank you in advance for the consideration of these views; while some of our complaints are fundamental in nature, many of the comments are specific and we're hopeful that the FWS will make appropriate changes in the FEIS. If you or your staff has any questions about these comments, please contact me.

Sincerely,

Hank Fischer

Hank Fischer
Montana representative
304 East Franklin
Missoula, MT 59801

cc: Max Baucus
John Melcher
Ron Marlenee



Response to Defenders of Wildlife

1. The FWS considered five alternatives including two not within its augmentation authority (as per CEQ regulations). Three of the five alternatives detail how livestock reductions might take place.

2. The text of Alternative C, Intensive Wildlife Management, in view of public comment and further evaluation, has been rewritten to reduce some of the more costly elements (fencing and land acquisition) while retaining the intended purpose expressed in the name of this alternative.

3. The amount of forage available to livestock was computed on a section-by-section basis. Since there are over 1,000 sections on CMR, a listing of the tabulation of each is beyond the scope of this document. The 32.6 percent reduction is an average of the reductions applied to the sections. See also revised Appendices 1b (new), 2, and 15 for methodology.

4. CMR habitat was evaluated on a section-by-section basis and actions prescribed for each. See response #2 above.

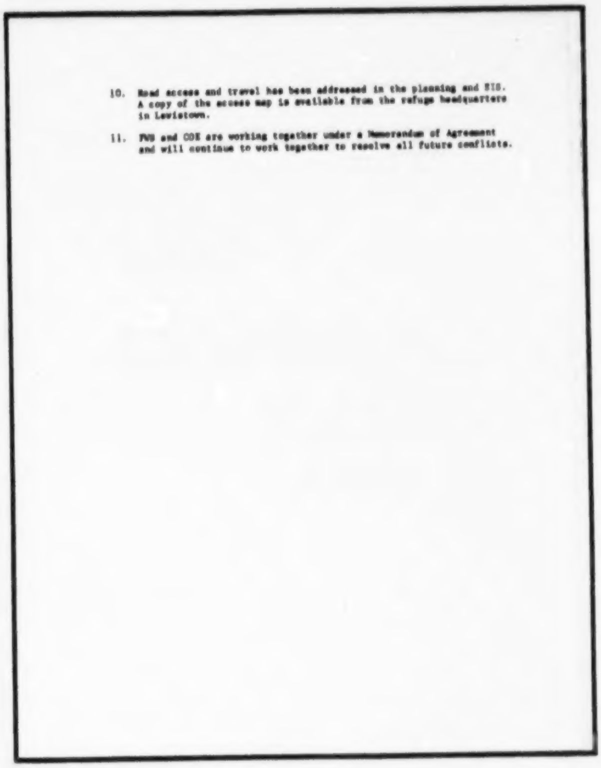
5. FWS experience has shown that bison management by a government agency is both difficult and expensive. Therefore, use of bison to manipulate vegetation for wildlife was not selected for the Proposed Action. The FWS will work with any permittee who proposes to substitute bison AUMs for cattle AUMs in a CMR allotment. Bison reintroduction is included in the Intensive Wildlife Management alternative.

6. Predator control has been fully addressed in the FEIS-Mammalian Predator Damage Management for Livestock Production in the Western U.S., and also in the FEIS-Operation of the National Wildlife Refuge System.

7. After reviewing public comment and reexamining pertinent research, the FWS has concluded that soil ripping is not a viable manipulative technique for habitat management on CMR. All references to ripping have been deleted from the Proposed Action.

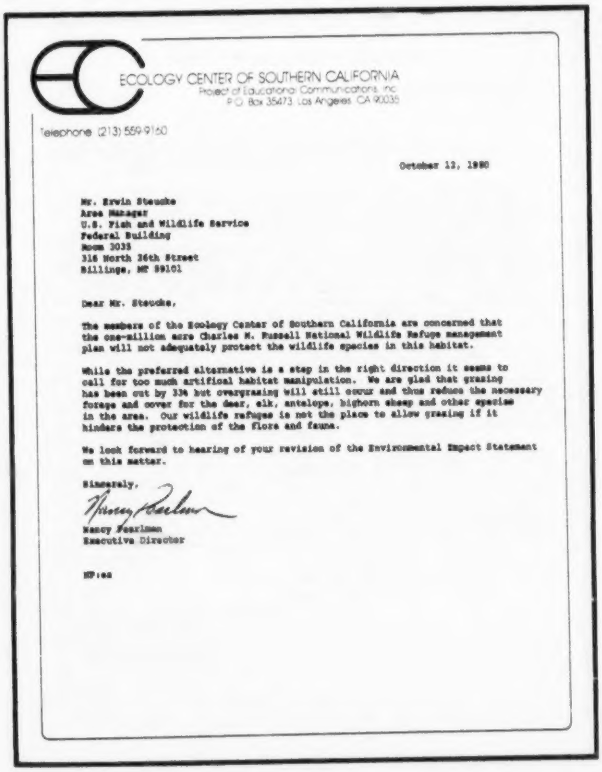
8. The cabins are under the authority and are leased from the Corps of Engineers on designated areas.

9. Plans in the Proposed Action provide for as much development and activity in wildlife interpretation and education as our projections indicate there will be demand for in the foreseeable future.



10. Road access and travel has been addressed in the planning and EIS. A copy of the access map is available from the refuge headquarters in Lewistown.

11. FWS and COE are working together under a Memorandum of Agreement and will continue to work together to resolve all future conflicts.



ECOLOGY CENTER OF SOUTHERN CALIFORNIA
Project of Educational Communications, Inc
P.O. Box 35473, Los Angeles, CA 90035

Telephone (213) 559-9160

October 12, 1980

Mr. Erwin Steucke
Area Manager
U.S. Fish and Wildlife Service
Federal Building
Room 3035
316 North 26th Street
Billings, MT 59101

Dear Mr. Steucke,

The members of the Ecology Center of Southern California are concerned that the one-million acre Charles M. Russell National Wildlife Refuge management plan will not adequately protect the wildlife species in this habitat.

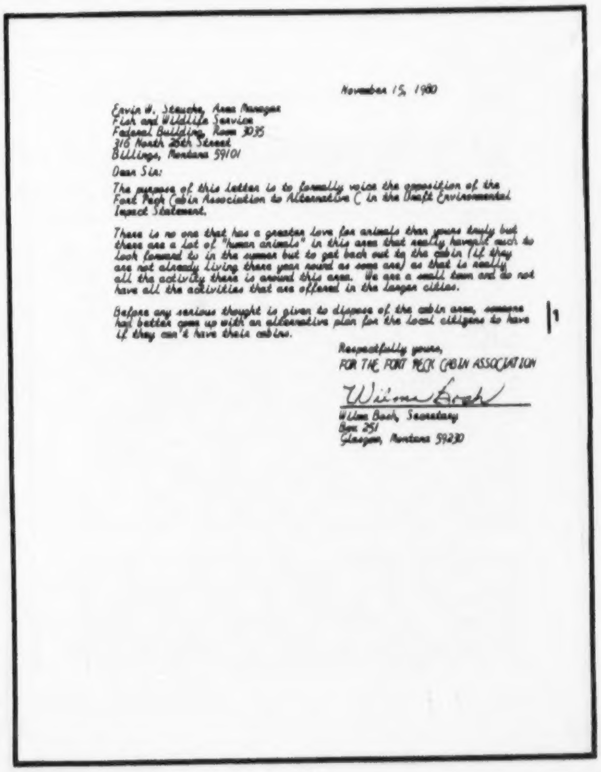
While the preferred alternative is a step in the right direction it seems to call for too much artifical habitat manipulation. We are glad that grazing has been cut by 33% but overgrazing will still occur and thus reduce the necessary forage and cover for the deer, elk, antelope, bighorn sheep and other species in the area. Our wildlife refuges is not the place to allow grazing if it hinders the protection of the flora and fauna.

We look forward to hearing of your revision of the Environmental Impact Statement on this matter.

Sincerely,

Nancy Pearlman
Executive Director

NP:ea



November 15, 1980

Ervin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3035
316 North 26th Street
Billings, Montana 59101

Dear Sir:

The purpose of this letter is to formally voice the opposition of the Fort Peck Cabin Association to Alternative C in the Draft Environmental Impact Statement.

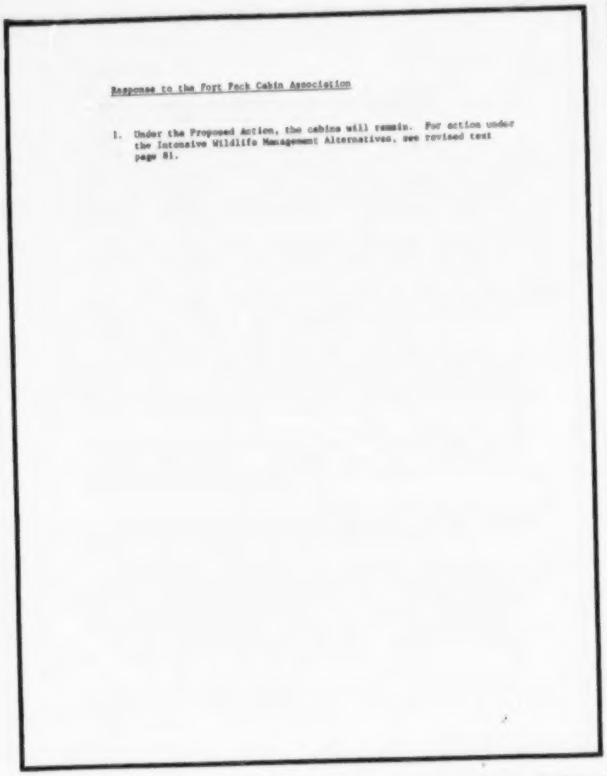
There is no one that has a greater love for animals than yours truly but there are a lot of "human animals" in this area that really haven't much to look forward to in the summer but to get back out to the cabin (if they are not already living there year round as some are) as that is really all the activity there is around this area. We are a small town and do not have all the activities that are offered in the larger cities.

Before any serious thought is given to dispose of the cabin area, someone had better come up with an alternative plan for the local citizens to have if they can't have their cabins. 1

Respectfully yours,
FOR THE FORT PECK CABIN ASSOCIATION

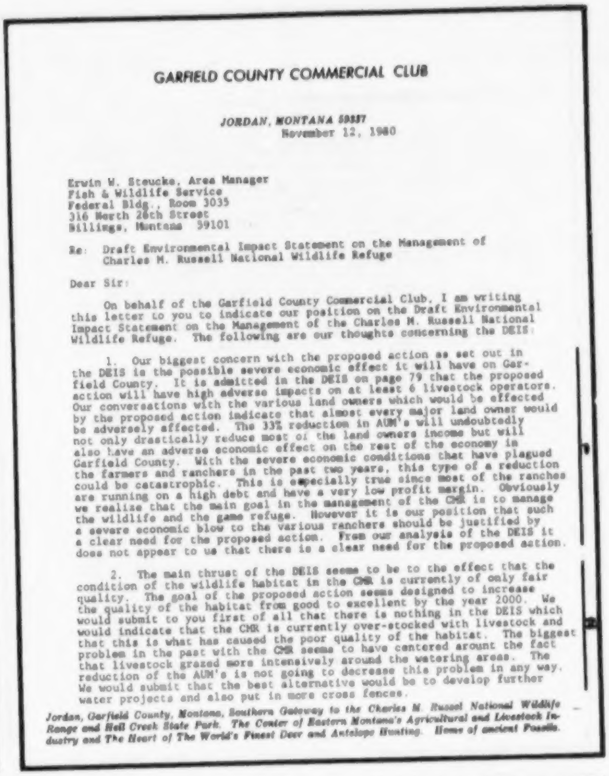
Wilma Bach

Wilma Bach, Secretary
Box 251
Glasgow, Montana 59230



Response to the Fort Peck Cabin Association

1. Under the Proposed Action, the cabins will remain. For action under the Intensive Wildlife Management Alternatives, see revised text page 81.



GARFIELD COUNTY COMMERCIAL CLUB

JORDAN, MONTANA 59337
November 12, 1980

Erwin W. Steucke, Area Manager
Fish & Wildlife Service
Federal Bldg., Room 3035
316 North 26th Street
Billings, Montana 59101

Re: Draft Environmental Impact Statement on the Management of Charles M. Russell National Wildlife Refuge

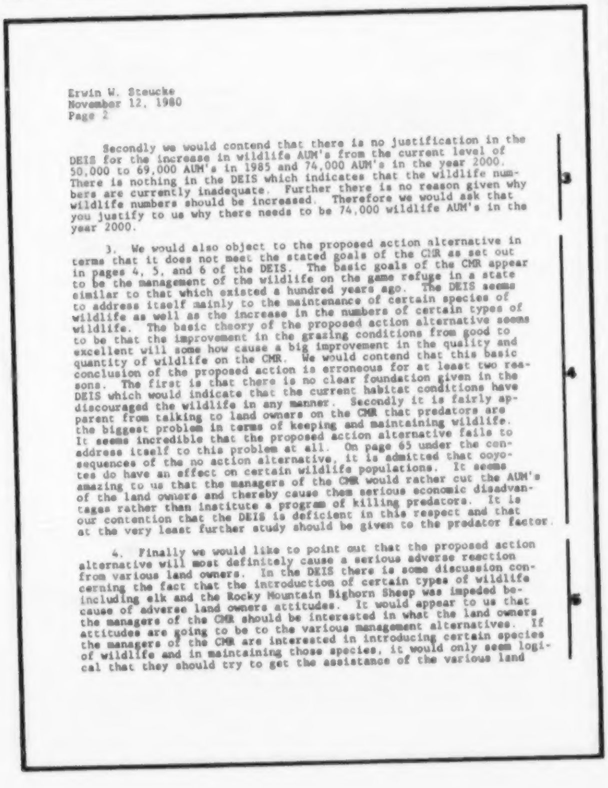
Dear Sir:

On behalf of the Garfield County Commercial Club, I am writing this letter to you to indicate our position on the Draft Environmental Impact Statement on the Management of the Charles M. Russell National Wildlife Refuge. The following are our thoughts concerning the DEIS:

1. Our biggest concern with the proposed action as set out in the DEIS is the possible severe economic effect it will have on Garfield County. It is admitted in the DEIS on page 79 that the proposed action will have high adverse impacts on at least 6 livestock operators. Our conversations with the various land owners which would be effected by the proposed action indicate that almost every major land owner would be adversely affected. The 33% reduction in AUM's will undoubtedly not only drastically reduce most of the land owners income but will also have an adverse economic effect on the rest of the economy in Garfield County. With the severe economic conditions that have plagued the farmers and ranchers in the past two years, this type of a reduction could be catastrophic. This is especially true since most of the ranches are running on a high debt and have a very low profit margin. Obviously we realize that the main goal in the management of the CMR is to manage the wildlife and the game refuge. However it is our position that such a severe economic blow to the various ranchers should be justified by a clear need for the proposed action. From our analysis of the DEIS it does not appear to us that there is a clear need for the proposed action. 1

2. The main thrust of the DEIS seems to be to the effect that the condition of the wildlife habitat in the CMR is currently of only fair quality. The goal of the proposed action seems designed to increase the quality of the habitat from good to excellent by the year 2000. We would submit to you first of all that there is nothing in the DEIS which would indicate that the CMR is currently over-stocked with livestock and that this is what has caused the poor quality of the habitat. The biggest problem in the past with the CMR seems to have centered arount the fact that livestock grazed more intensively around the watering areas. The reduction of the AUM's is not going to decrease this problem in any way. We would submit that the best alternative would be to develop further water projects and also put in more cross fences. 2

Jordan, Garfield County, Montana, Southern Gateway to the Charles M. Russel National Wildlife Range and Hell Creek State Park. The Center of Eastern Montana's Agricultural and Livestock Industry and The Heart of The World's Finest Deer and Antelope Hunting. Home of ancient Fossils.

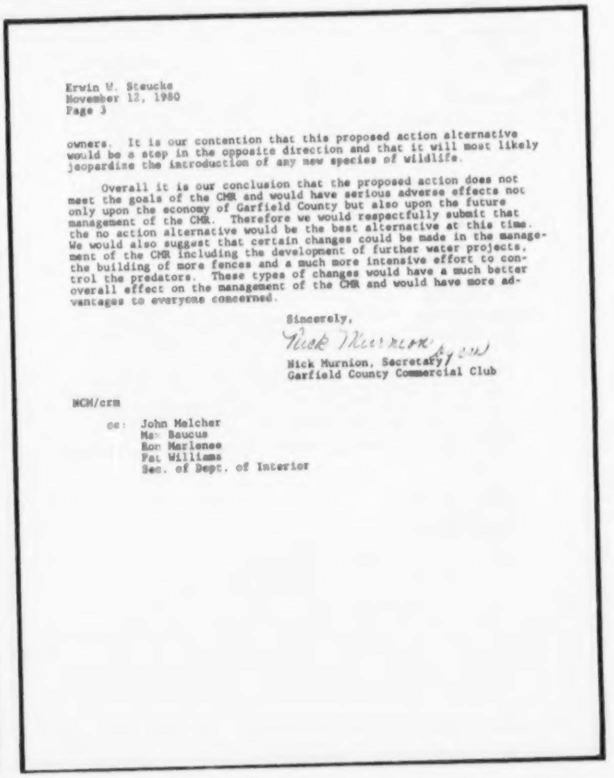


Erwin W. Steucke
November 12, 1980
Page 2

Secondly we would contend that there is no justification in the DEIS for the increase in wildlife AUM's from the current level of 50,000 to 69,000 AUM's in 1985 and 74,000 AUM's in the year 2000. There is nothing in the DEIS which indicates that the wildlife numbers are currently inadequate. Further there is no reason given why wildlife numbers should be increased. Therefore we would ask that you justify to us why there needs to be 74,000 wildlife AUM's in the year 2000. 3

3. We would also object to the proposed action alternative in terms that it does not meet the stated goals of the CMR as set out in pages 4, 5, and 6 of the DEIS. The basic goals of the CMR appear to be the management of the wildlife on the game refuge in a state similar to that which existed a hundred years ago. The DEIS seems to address itself mainly to the maintenance of certain species of wildlife as well as the increase in the numbers of certain types of wildlife. The basic theory of the proposed action alternative seems to be that the improvement in the grazing conditions from good to excellent will some how cause a big improvement in the quality and quantity of wildlife on the CMR. We would contend that this basic conclusion of the proposed action is erroneous for at least two reasons. The first is that there is no clear foundation given in the DEIS which would indicate that the current habitat conditions have discouraged the wildlife in any manner. Secondly it is fairly apparent from talking to land owners on the CMR that predators are the biggest problem in terms of keeping and maintaining wildlife. It seems incredible that the proposed action alternative fails to address itself to this problem at all. On page 65 under the consequences of the no action alternative, it is admitted that coyotes do have an effect on certain wildlife populations. It seems amazing to us that the managers of the CMR would rather cut the AUM's of the land owners and thereby cause them serious economic disadvantages rather than institute a program of killing predators. It is our contention that the DEIS is deficient in this respect and that at the very least further study should be given to the predator factor. 4

4. Finally we would like to point out that the proposed action alternative will most definitely cause a serious adverse reaction from various land owners. In the DEIS there is some discussion concerning the fact that the introduction of certain types of wildlife including elk and the Rocky Mountain Bighorn Sheep was impeded because of adverse land owners attitudes. It would appear to us that the managers of the CMR should be interested in what the land owners attitudes are going to be to the various management alternatives. If the managers of the CMR are interested in introducing certain species of wildlife and in maintaining those species, it would only seem logical that they should try to get the assistance of the various land 5



Erwin W. Steucke
November 12, 1980
Page 3

owners. It is our contention that this proposed action alternative would be a step in the opposite direction and that it will most likely jeopardize the introduction of any new species of wildlife.

Overall it is our conclusion that the proposed action does not meet the goals of the CMR and would have serious adverse effects not only upon the economy of Garfield County but also upon the future management of the CMR. Therefore we would respectfully submit that the no action alternative would be the best alternative at this time. We would also suggest that certain changes could be made in the management of the CMR including the development of further water projects, the building of more fences and a much more intensive effort to control the predators. These types of changes would have a much better overall effect on the management of the CMR and would have more advantages to everyone concerned.

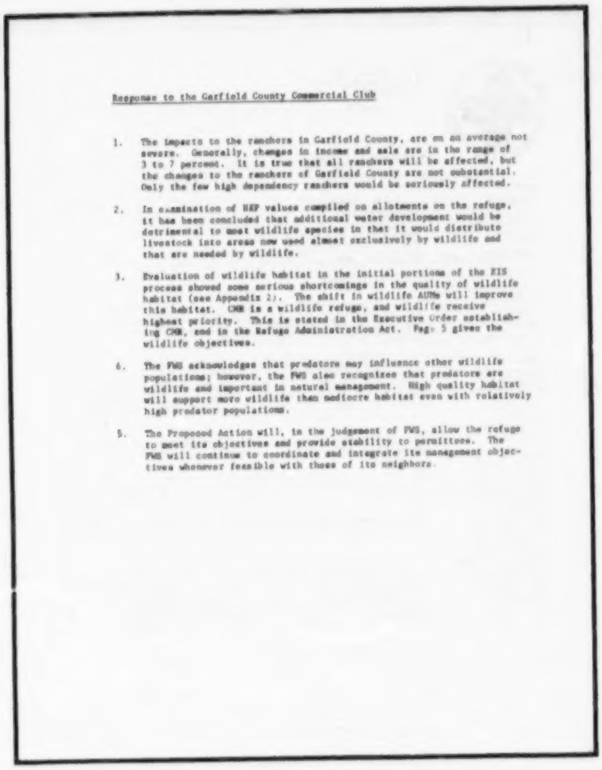
Sincerely,

Nick Murnion

Nick Murnion, Secretary
Garfield County Commercial Club

NCM/crm

cc: John Melcher
Max Baucus
Ron Marlenee
Pat Williams
Sec. of Dept. of Interior



Response to the Garfield County Commercial Club

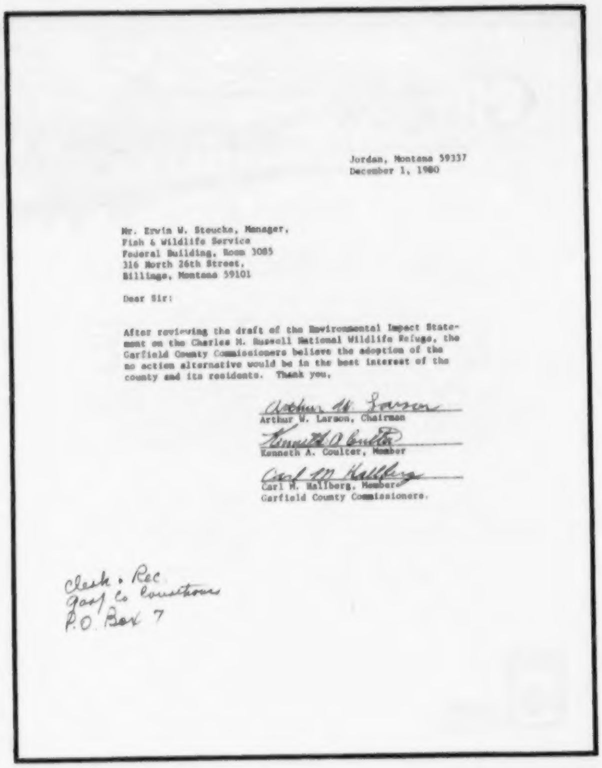
1. The impacts to the ranchers in Garfield County, are on an average not severe. Generally, changes in income and sale are in the range of 3 to 7 percent. It is true that all ranchers will be affected, but the changes to the ranchers of Garfield County are not substantial. Only the few high dependency ranchers would be seriously affected.

2. In examination of HEP values compiled on allotments on the refuge, it has been concluded that additional water development would be detrimental to most wildlife species in that it would distribute livestock into areas now used almost exclusively by wildlife and that are needed by wildlife.

3. Evaluation of wildlife habitat in the initial portions of the EIS process showed some serious shortcomings in the quality of wildlife habitat (see Appendix 2). The shift in wildlife AUMs will improve this habitat. CMR is a wildlife refuge, and wildlife receive highest priority. This is stated in the Executive Order establishing CMR, and in the Refuge Administration Act. Page 5 gives the wildlife objectives.

4. The FWS acknowledges that predators may influence other wildlife populations; however, the FWS also recognizes that predators are wildlife and important in natural management. High quality habitat will support more wildlife than mediocre habitat even with relatively high predator populations.

5. The Proposed Action will, in the judgement of FWS, allow the refuge to meet its objectives and provide stability to permittees. The FWS will continue to coordinate and integrate its management objectives whenever feasible with those of its neighbors.



Jordan, Montana 59337
December 1, 1980

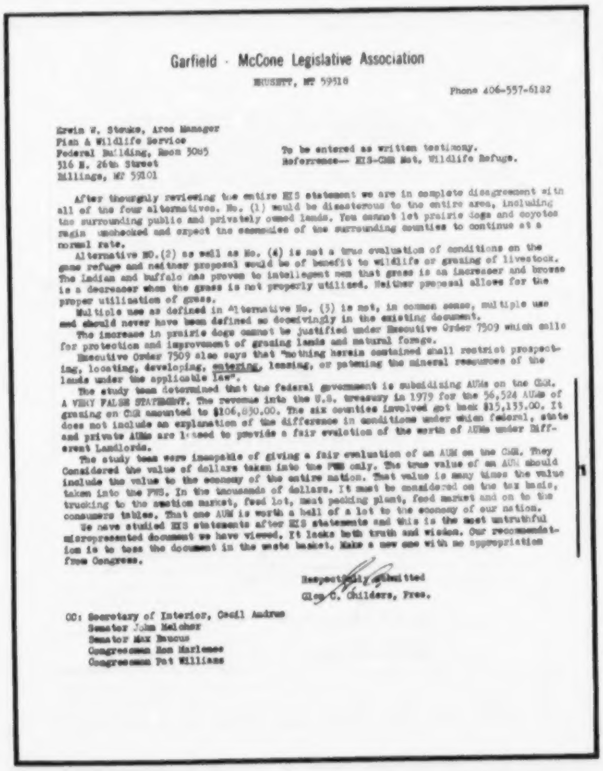
Mr. Erwin W. Steucke, Manager,
Fish & Wildlife Service
Federal Building, Room 3085
316 North 26th Street,
Billings, Montana 59101

Dear Sir:

After reviewing the draft of the Environmental Impact Statement on the Charles M. Russell National Wildlife Refuge, the Garfield County Commissioners believe the adoption of the no action alternative would be in the best interest of the county and its residents. Thank you.

Arthur W. Larson
Arthur W. Larson, Chairman
Kenneth A. Coulter
Kenneth A. Coulter, Member
Carl M. Hallberg
Carl M. Hallberg, Member
Garfield County Commissioners.

Clerk • Rec.
Garf Co Courthouse
P.O. Box 7



Garfield · McCone Legislative Association

BRUSETT, MT 59318

Phone 406-557-6182

Erwin W. Steuke, Area Manager
Fish & Wildlife Service
Federal Building, Room 3085
316 N. 26th Street
Billings, MT 59101

To be entered as written testimony.
Reference— EIS-CMR Nat. Wildlife Refuge.

After thourghly reviewing the entire EIS statement we are in complete disagreement with all of the four alternatives. No. (1) would be disasterous to the entire area, including the surrounding public and privately owned lands. You cannot let prairie dogs and coyotes ragin unchecked and expect the economies of the surrounding counties to continue at a normal rate.

Alternative NO.(2) as well as No. (4) is not a true evaluation of conditions on the game refuge and neither proposal would be of benefit to wildlife or grazing of livestock. The Indian and buffalo has proven to intelligent men that grass is an increaser and browse is a decreaser when the grass is not properly utilized. Neither proposal allows for the proper utilization of grass.

Multiple use as defined in Alternative No. (3) is not, in common sense, multiple use and should never have been defined so deceivingly in the existing document.

The increase in prairie dogs cannot be justified under Executive Order 7509 which calls for protection and improvement of grazing lands and natural forage.

Executive Order 7509 also says that "nothing herein contained shall restrict prospecting, locating, developing, entering, leasing, or patening the mineral resources of the lands under the applicable law".

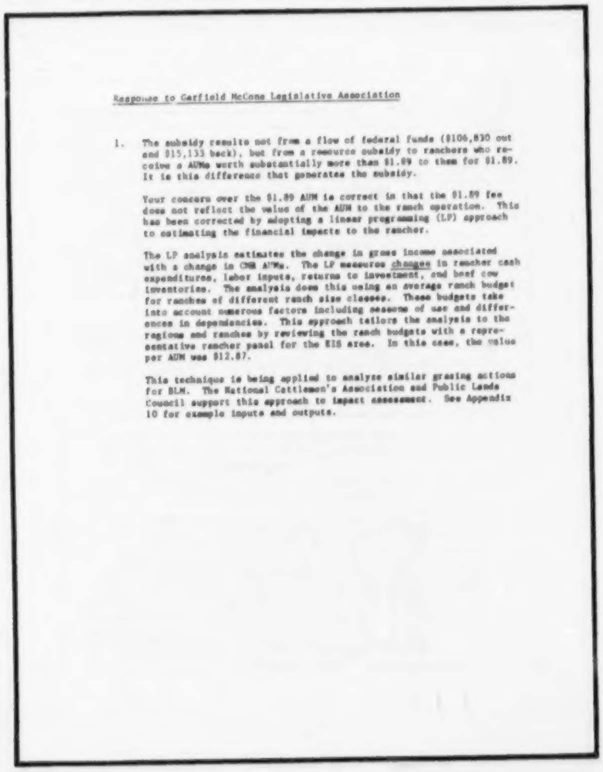
The study team determined that the federal government is subsidizing AUMs on the CMR. A VERY FALSE STATEMENT. The revenue into the U.S. treasury in 1979 for the 56,524 AUMs of grazing on CMR amounted to $106,830.00. The six counties involved got back $15,133.00. It does not include an explanation of the difference in conditions under which federal, state and private AUMs are leased to provide a fair evalution of the worth of AUMs under Different Landlords.

The study team were incapable of giving a fair evaluation of an AUM on the CMR. They Considered the value of dollars taken into the FWS only. The true value of an AUM should include the value to the economy of the entire nation. That value is many times the value taken into the FWS. In the thousands of dollars. It must be considered on the tax basis, trucking to the auction market, feed lot, meat packing plant, food market and on to the consumers tables. That one AUM is worth a hell of a lot to the economy of our nation.

We have studied EIS statements after EIS statements and this is the most untruthful misrepresented document we have viewed. It lacks both truth and wisdom. Our recommendation is to toss the document in the waste basket. Make a new one with no appropriation from Congress.

Respectfully submitted
Glen C. Childers, Pres.

CC: Secretary of Interior, Cecil Andrus
Senator John Melcher
Senator Max Baucus
Congressman Ron Marlenee
Congressman Pat Williams



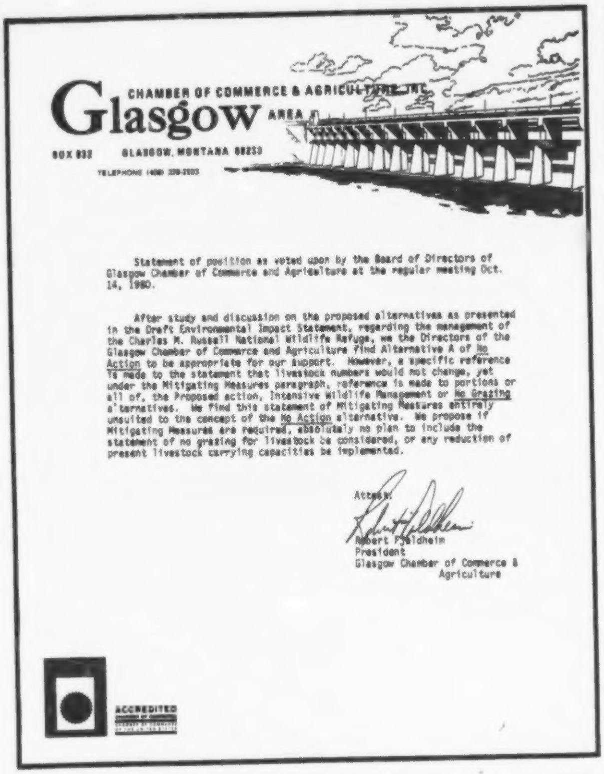
Response to Garfield McCone Legislative Association

1. The subsidy results not from a flow of federal funds ($106,830 out and $15,133 back), but from a resource subsidy to ranchers who receive a AUMs worth substantially more than $1.89 to them for $1.89. It is this difference that generates the subsidy.

   Your concern over the $1.89 AUM is correct in that the $1.89 fee does not reflect the value of the AUM to the ranch operation. This has been corrected by adopting a linear programming (LP) approach to estimating the financial impacts to the rancher.

   The LP analysis estimates the change in gross income associated with a change in CMR AUMs. The LP measures changes in rancher cash expenditures, labor inputs, returns to investment, and beef cow inventories. The analysis does this using an average ranch budget for ranches of different ranch size classes. These budgets take into account numerous factors including seasons of use and differences in dependencies. This approach tailors the analysis to the regions and ranches by reviewing the ranch budgets with a representative rancher panel for the EIS area. In this case, the value per AUM was $12.87.

   This technique is being applied to analyze similar grazing actions for BLM. The National Cattlemen's Association and Public Lands Council support this approach to impact assessment. See Appendix 10 for example inputs and outputs.



Glasgow AREA
CHAMBER OF COMMERCE & AGRICULTURE INC.
BOX 832 GLASGOW, MONTANA 59230
TELEPHONE (406) 228-2222

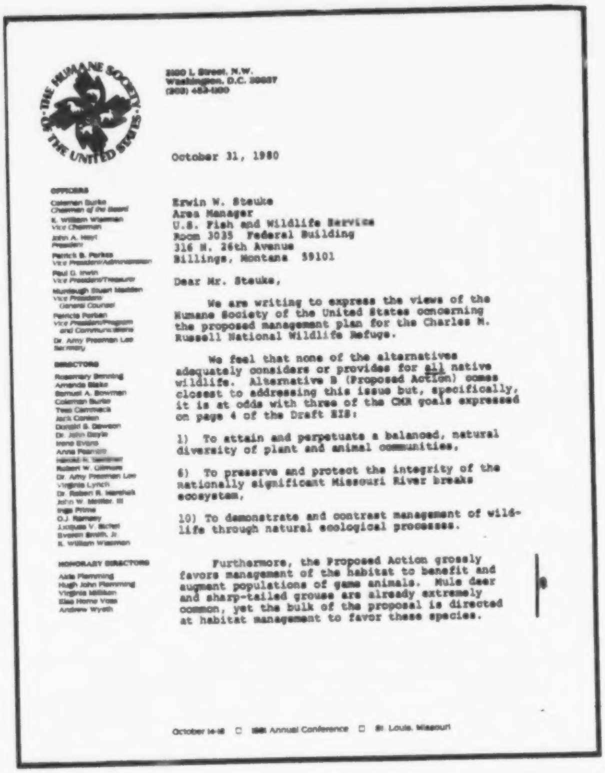
Statement of position as voted upon by the Board of Directors of Glasgow Chamber of Commerce and Agriculture at the regular meeting Oct. 14, 1980.

After study and discussion on the proposed alternatives as presented in the Draft Environmental Impact Statement, regarding the management of the Charles M. Russell National Wildlife Refuge, we the Directors of the Glasgow Chamber of Commerce and Agriculture find Alternative A of No Action to be appropriate for our support. However, a specific reference is made to the statement that livestock numbers would not change, yet under the Mitigating Measures paragraph, reference is made to portions or all of, the Proposed action, Intensive Wildlife Management or No Grazing alternatives. We find this statement of Mitigating Measures entirely unsuited to the concept of the No Action alternative. We propose if Mitigating Measures are required, absolutely no plan to include the statement of no grazing for livestock be considered, or any reduction of present livestock carrying capacities be implemented.

Attest: Robert Fjeldheim

Robert Fjeldheim
President
Glasgow Chamber of Commerce & Agriculture

ACCREDITED
CHAMBER OF COMMERCE
CHAMBER OF COMMERCE OF THE UNITED STATES



THE HUMANE SOCIETY OF THE UNITED STATES
2100 L Street, N.W.
Washington, D.C. 20037
(202) 452-1100

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October 31, 1980

Erwin W. Steuke
Area Manager
U.S. Fish and Wildlife Service
Room 3035 Federal Building
316 N. 26th Avenue
Billings, Montana 59101

Dear Mr. Steuke,

We are writing to express the views of the Humane Society of the United States concerning the proposed management plan for the Charles M. Russell National Wildlife Refuge.

We feel that none of the alternatives adequately considers or provides for all native wildlife. Alternative B (Proposed Action) comes closest to addressing this issue but, specifically, it is at odds with three of the CMR goals expressed on page 4 of the Draft EIS:

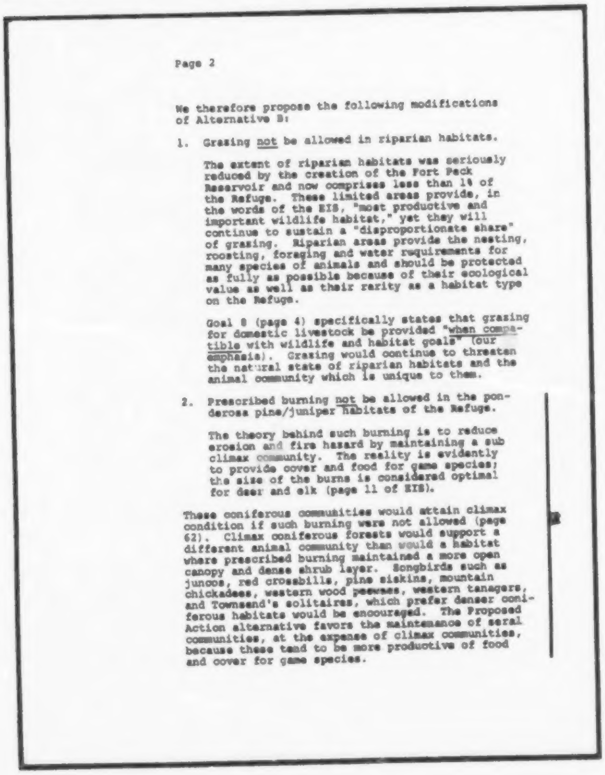
1) To attain and perpetuate a balanced, natural diversity of plant and animal communities,

6) To preserve and protect the integrity of the nationally significant Missouri River breaks ecosystem,

10) To demonstrate and contrast management of wildlife through natural ecological processes.

Furthermore, the Proposed Action grossly favors management of the habitat to benefit and augment populations of game animals. Mule deer and sharp-tailed grouse are already extremely common, yet the bulk of the proposal is directed at habitat management to favor these species.

October 14-18 ☐ 1981 Annual Conference ☐ St. Louis, Missouri



Page 2

We therefore propose the following modifications of Alternative B:

1. Grazing not be allowed in riparian habitats.

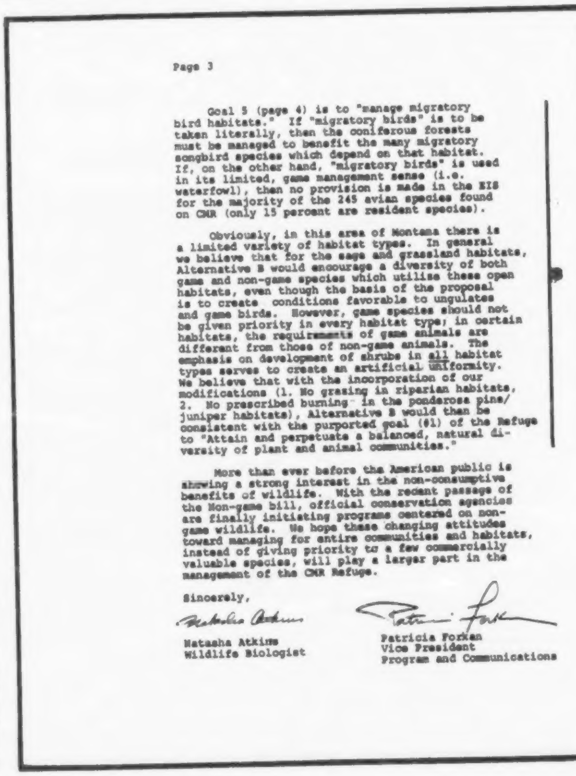
   The extent of riparian habitats was seriously reduced by the creation of the Fort Peck Reservoir and now comprises less than 1% of the Refuge. These limited areas provide, in the words of the EIS, "most productive and important wildlife habitat," yet they will continue to sustain a "disproportionate share" of grazing. Riparian areas provide the nesting, roosting, foraging and water requirements for many species of animals and should be protected as fully as possible because of their ecological value as well as their rarity as a habitat type on the Refuge.

   Goal 8 (page 4) specifically states that grazing for domestic livestock be provided "when compatible with wildlife and habitat goals" (our emphasis). Grazing would continue to threaten the natural state of riparian habitats and the animal community which is unique to them.

2. Prescribed burning not be allowed in the ponderosa pine/juniper habitats of the Refuge.

   The theory behind such burning is to reduce erosion and fire hazard by maintaining a sub climax community. The reality is evidently to provide cover and food for game species; the size of the burns is considered optimal for deer and elk (page 11 of EIS).

These coniferous communities would attain climax condition if such burning were not allowed (page 62). Climax coniferous forests would support a different animal community than would a habitat where prescribed burning maintained a more open canopy and dense shrub layer. Songbirds such as juncos, red crossbills, pine siskins, mountain chickadees, western wood peewees, western tanagers, and Townsend's solitaires, which prefer denser coniferous habitats would be encouraged. The Proposed Action alternative favors the maintenance of seral communities, at the expense of climax communities, because these tend to be more productive of food and cover for game species.



Page 3

Goal 5 (page 4) is to "manage migratory bird habitats." If "migratory birds" is to be taken literally, then the coniferous forests must be managed to benefit the many migratory songbird species which depend on that habitat. If, on the other hand, "migratory birds" is used in its limited, game management sense (i.e. waterfowl), then no provision is made in the EIS for the majority of the 245 avian species found on CMR (only 15 percent are resident species).

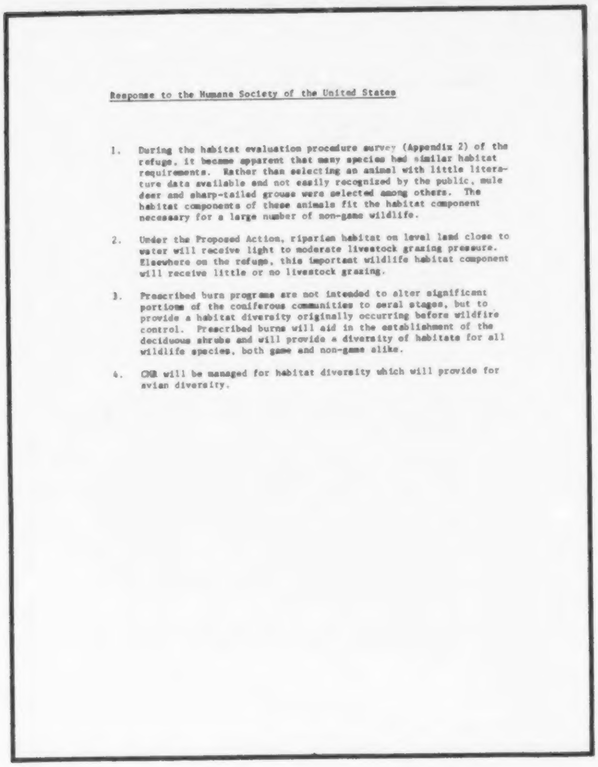
Obviously, in this area of Montana there is a limited variety of habitat types. In general we believe that for the sage and grassland habitats, Alternative B would encourage a diversity of both game and non-game species which utilize these open habitats, even though the basis of the proposal is to create conditions favorable to ungulates and game birds. However, game species should not be given priority in every habitat type; in certain habitats, the requirements of game animals are different from those of non-game animals. The emphasis on development of shrubs in all habitat types serves to create an artificial uniformity. We believe that with the incorporation of our modifications (1. No grazing in riparian habitats, 2. No prescribed burning in the ponderosa pine/juniper habitats), Alternative B would then be consistent with the purported goal (#1) of the Refuge to "Attain and perpetuate a balanced, natural diversity of plant and animal communities."

More than ever before the American public is showing a strong interest in the non-consumptive benefits of wildlife. With the recent passage of the Non-game bill, official conservation agencies are finally initiating programs centered on non-game wildlife. We hope these changing attitudes toward managing for entire communities and habitats, instead of giving priority to a few commercially valuable species, will play a larger part in the management of the CMR Refuge.

Sincerely,

Natasha Atkins
Wildlife Biologist

Patricia Forkan
Patricia Forkan
Vice President
Program and Communications



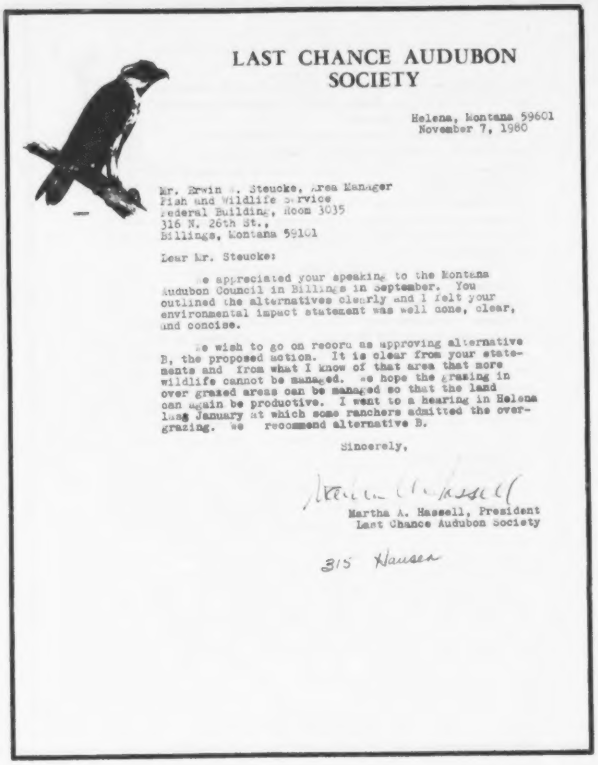
Response to the Humane Society of the United States

1. During the habitat evaluation procedure survey (Appendix 2) of the refuge, it became apparent that many species had similar habitat requirements. Rather than selecting an animal with little literature data available and not easily recognized by the public, mule deer and sharp-tailed grouse were selected among others. The habitat components of these animals fit the habitat component necessary for a large number of non-game wildlife.

2. Under the Proposed Action, riparian habitat on level land close to water will receive light to moderate livestock grazing pressure. Elsewhere on the refuge, this important wildlife habitat component will receive little or no livestock grazing.

3. Prescribed burn programs are not intended to alter significant portions of the coniferous communities to seral stages, but to provide a habitat diversity originally occurring before wildfire control. Prescribed burns will aid in the establishment of the deciduous shrubs and will provide a diversity of habitats for all wildlife species, both game and non-game alike.

4. CMR will be managed for habitat diversity which will provide for avian diversity.



LAST CHANCE AUDUBON
SOCIETY

Helena, Montana 59601
November 7, 1980

Mr. Erwin [illegible]. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3035
316 N. 26th St.,
Billings, Montana 59101

Dear Mr. Steucke:

We appreciated your speaking to the Montana Audubon Council in Billings in September. You outlined the alternatives clearly and I felt your environmental impact statement was well done, clear, and concise.

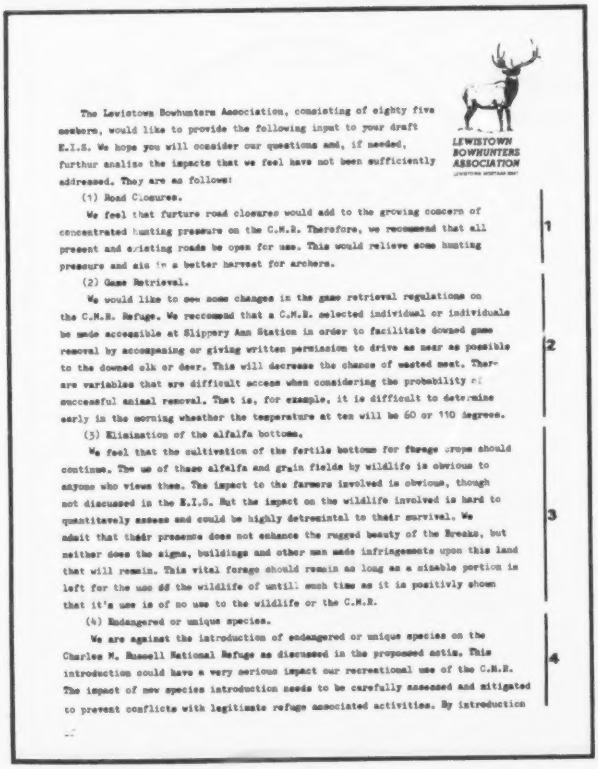
We wish to go on record as approving alternative B, the proposed action. It is clear from your statements and from what I know of that area that more wildlife cannot be managed. We hope the grazing in over grazed areas can be managed so that the land can again be productive. I went to a hearing in Helena last January at which some ranchers admitted the overgrazing. We recommend alternative B.

Sincerely,

Martha A. Hassell

Martha A. Hassell, President
Last Chance Audubon Society

315 Hausen



LEWISTOWN
BOWHUNTERS
ASSOCIATION

The Lewistown Bowhunters Association, consisting of eighty five members, would like to provide the following input to your draft E.I.S. We hope you will consider our questions and, if needed, furthur analise the impacts that we feel have not been sufficiently addressed. They are as follows:

(1) Road Closures.

We feel that furture road closures would add to the growing concern of concentrated hunting pressure on the C.M.R. Therefore, we recommend that all present and existing roads be open for use. This would relieve some hunting pressure and ais in a better harvest for archers. 1

(2) Game Retrieval.

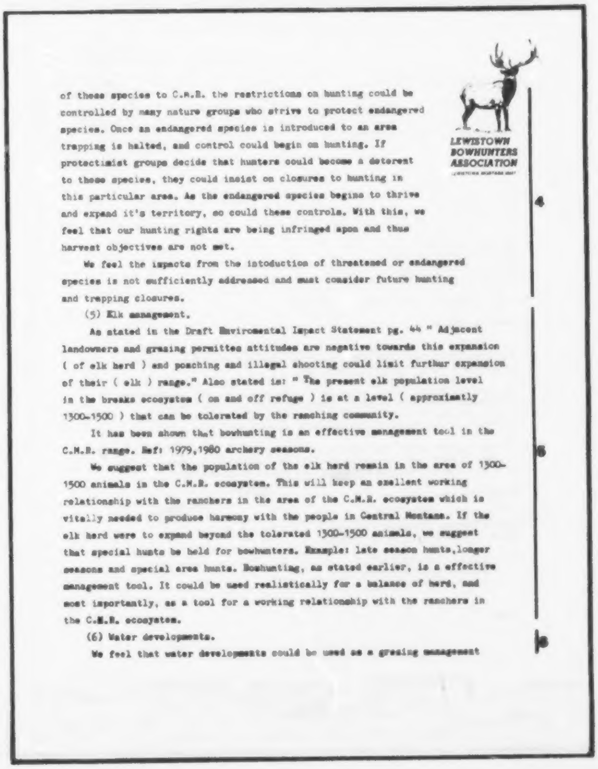
We would like to see some changes in the game retrieval regulations on the C.M.R. Refuge. We reccomend that a C.M.R. selected individual or individuals be made accessible at Slippery Ann Station in order to facilitate downed game removal by accompaning or giving written permission to drive as near as possible to the downed elk or deer. This will decrease the chance of wasted meat. There are variables that are difficult access when considering the probability of successful animal removal. That is, for example, it is difficult to determine early in the morning wheather the temperature at ten will be 60 or 110 degrees. 2

(3) Elimination of the alfalfa bottoms.

We feel that the cultivation of the fertile bottoms for forage crops should continue. The us of these alfalfa and grain fields by wildlife is obvious to anyone who views them. The impact to the farmers involved is obvious, though not discussed in the E.I.S. But the impact on the wildlife involved is hard to quantitavely assess and could be highly detremintal to their survival. We admit that their presence does not enhance the rugged beauty of the Breaks, but neither does the signs, buildings and other man made infringements upon this land that will remain. This vital forage should remain as long as a sizable portion is left for the use ## the wildlife of untill such time as it is positivly shown that it's use is of no use to the wildlife or the C.M.R. 3

(4) Endangered or unique species.

We are against the introduction of endangered or unique species on the Charles M. Russell National Refuge as discussed in the proposed actin. This introduction could have a very serious impact our recreational use of the C.M.R. The impact of new species introduction needs to be carefully assessed and mitigated to prevent conflicts with legitimate refuge associated activities. By introduction 4



LEWISTOWN
BOWHUNTERS
ASSOCIATION

of these species to C.M.R. the restrictions on hunting could be controlled by many nature groups who strive to protect endangered species. Once an endangered species is introduced to an area trapping is halted, and control could begin on hunting. If protectimist groups decide that hunters could become a deterent to these species, they could insist on closures to hunting in this particular area. As the endangered species begins to thrive and expand it's territory, so could these controls. With this, we feel that our hunting rights are being infringed upon and thus harvest objectives are not met.

We feel the impacts from the intoduction of threatened or endangered species is not sufficiently addressed and must consider future hunting and trapping closures. 4

(5) Elk management.

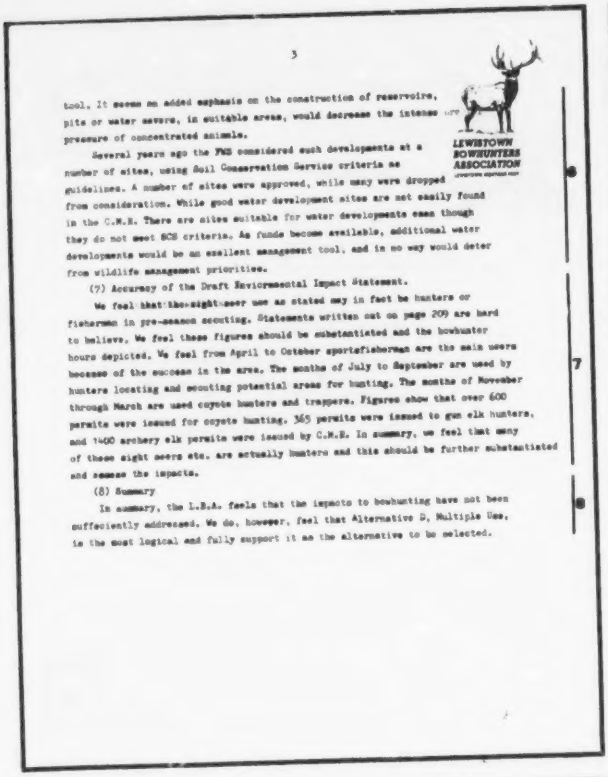
As stated in the Draft Environmental Impact Statement pg. 44 " Adjacent landowners and grazing permittee attitudes are negative towards this expansion (of elk herd) and poaching and illegal shooting could limit furthur expansion of their (elk) range." Also stated is: " The present elk population level in the breaks ecosystem (on and off refuge) is at a level (approximatly 1300-1500) that can be tolerated by the ranching community.

It has been shown that bowhunting is an effective management tool in the C.M.R. range. Ref: 1979,1980 archery seasons.

We suggest that the population of the elk herd remain in the area of 1300-1500 animals in the C.M.R. ecosystem. This will keep an exellent working relationship with the ranchers in the area of the C.M.R. ecosystem which is vitally needed to produce harmony with the people in Central Montana. If the elk herd were to expand beyond the tolerated 1300-1500 animals, we suggest that special hunts be held for bowhunters. Example: late season hunts,longer seasons and special area hunts. Bowhunting, as stated earlier, is a effective management tool. It could be used realistically for a balance of herd, and most importantly, as a tool for a working relationship with the ranchers in the C.M.R. ecosystem. 5

(6) Water developments.

We feel that water developments could be used as a grazing management 6



3

LEWISTOWN BOWHUNTERS ASSOCIATION

tool. It seems an added emphasis on the construction of reservoirs, pits or water severs, in suitable areas, would decrease the intense pressure of concentrated animals.

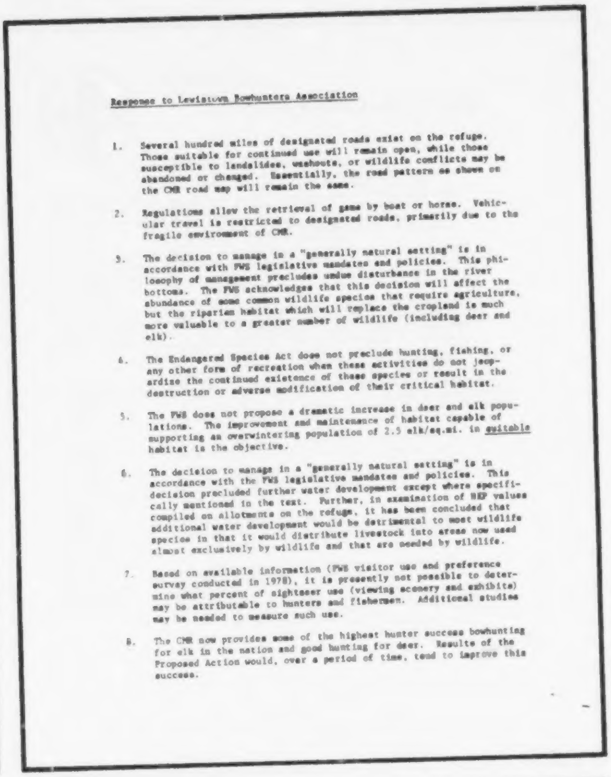
Several years ago the FWS considered such developments at a number of sites, using Soil Conservation Service criteria as guidelines. A number of sites were approved, while many were dropped from consideration. While good water development sites are not easily found in the C.M.R. There are sites suitable for water developments even though they do not meet SCS criteria. As funds become available, additional water developments would be an exellent management tool, and in no way would deter from wildlife management priorities.

(7) Accuracy of the Draft Enviormental Impact Statement.

We feel that the sight-seer use as stated may in fact be hunters or fishermen in pre-season scouting. Statements written out on page 209 are hard to believe. We feel these figures should be substantiated and the bowhunter hours depicted. We feel from April to October sportsfisherman are the main users because of the success in the area. The months of July to September are used by hunters locating and scouting potential areas for hunting. The months of November through March are used coyote hunters and trappers. Figures show that over 600 permits were issued for coyote hunting. 365 permits were issued to gun elk hunters, and 1400 archery elk permits were issued by C.M.R. In summary, we feel that many of these sight seers etc. are actually hunters and this should be further substantiated and assess the impacts. 7

(8) Summary

In summary, the L.B.A. feels that the impacts to bowhunting have not been suffeciently addressed. We do, however, feel that Alternative D, Multiple Use, is the most logical and fully support it as the alternative to be selected.



Response to Lewistown Bowhunters Association

1. Several hundred miles of designated roads exist on the refuge. Those suitable for continued use will remain open, while those susceptible to landslides, washouts, or wildlife conflicts may be abandoned or changed. Essentially, the road pattern as shown on the CMR road map will remain the same.

2. Regulations allow the retrieval of game by boat or horse. Vehicular travel is restricted to designated roads, primarily due to the fragile environment of CMR.

3. The decision to manage in a "generally natural setting" is in accordance with FWS legislative mandates and policies. This philosophy of management precludes undue disturbance in the river bottoms. The FWS acknowledges that this decision will affect the abundance of some common wildlife species that require agriculture, but the riparian habitat which will replace the cropland is much more valuable to a greater number of wildlife (including deer and elk).

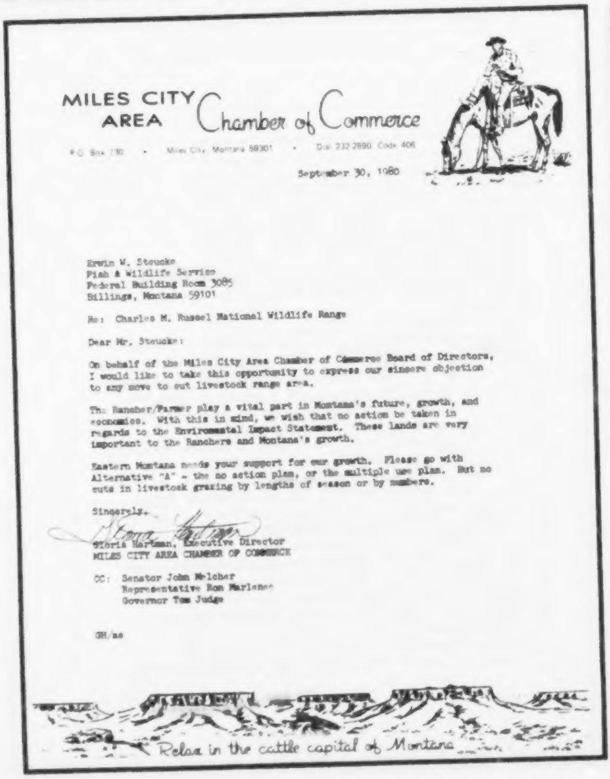
4. The Endangered Species Act does not preclude hunting, fishing, or any other form of recreation when these activities do not jeopardize the continued existence of these species or result in the destruction or adverse modification of their critical habitat.

5. The FWS does not propose a dramatic increase in deer and elk populations. The improvement and maintenance of habitat capable of supporting an overwintering population of 2.5 elk/sq.mi. in suitable habitat is the objective.

6. The decision to manage in a "generally natural setting" is in accordance with the FWS legislative mandates and policies. This decision precluded further water development except where specifically mentioned in the text. Further, in examination of HEP values compiled on allotments on the refuge, it has been concluded that additional water development would be detrimental to most wildlife species in that it would distribute livestock into areas now used almost exclusively by wildlife and that are needed by wildlife.

7. Based on available information (FWS visitor use and preference survey conducted in 1978), it is presently not possible to determine what percent of sightseer use (viewing scenery and exhibits) may be attributable to hunters and fishermen. Additional studies may be needed to measure such use.

8. The CMR now provides some of the highest hunter success bowhunting for elk in the nation and good hunting for deer. Results of the Proposed Action would, over a period of time, tend to improve this success.



MILES CITY
AREA Chamber of Commerce

P.O. Box 730 • Miles City, Montana 59301 • Dial 232-2890 Code 406

September 30, 1980

Erwin W. Steucke
Fish & Wildlife Service
Federal Building Room 3085
Billings, Montana 59101

Re: Charles M. Russel National Wildlife Range

Dear Mr. Steucke:

On behalf of the Miles City Area Chamber of Commerce Board of Directors, I would like to take this opportunity to express our sincere objection to any move to cut livestock range area.

The Rancher/Farmer play a vital part in Montana's future, growth, and economies. With this in mind, we wish that no action be taken in regards to the Environmental Impact Statement. These lands are very important to the Ranchers and Montana's growth.

Eastern Montana needs your support for our growth. Please go with Alternative "A" - the no action plan, or the multiple use plan. But no cuts in livestock grazing by lengths of season or by numbers.

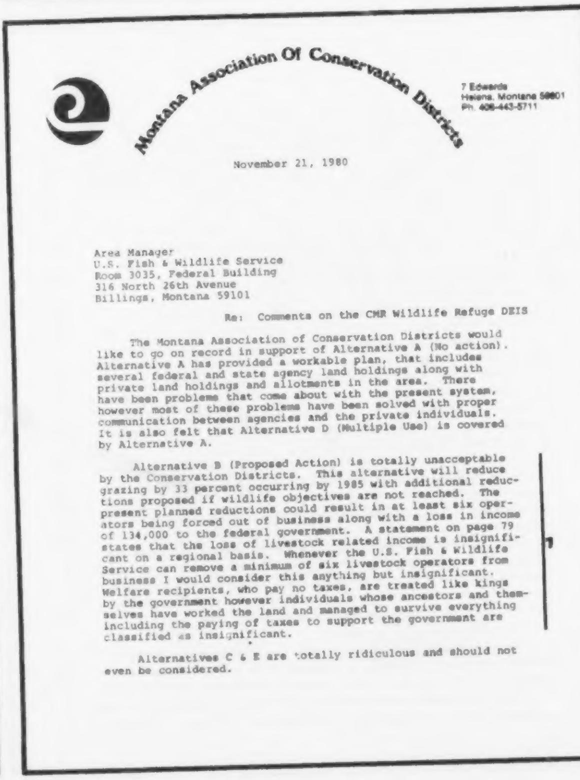
Sincerely,

Gloria Hartman, Executive Director
MILES CITY AREA CHAMBER OF COMMERCE

CC: Senator John Melcher
Representative Ron Marlenee
Governor Tom Judge

GH/ae

Relax in the cattle capital of Montana



Montana Association Of Conservation Districts

7 Edwards
Helena, Montana 59601
Ph. 406-443-5711

November 21, 1980

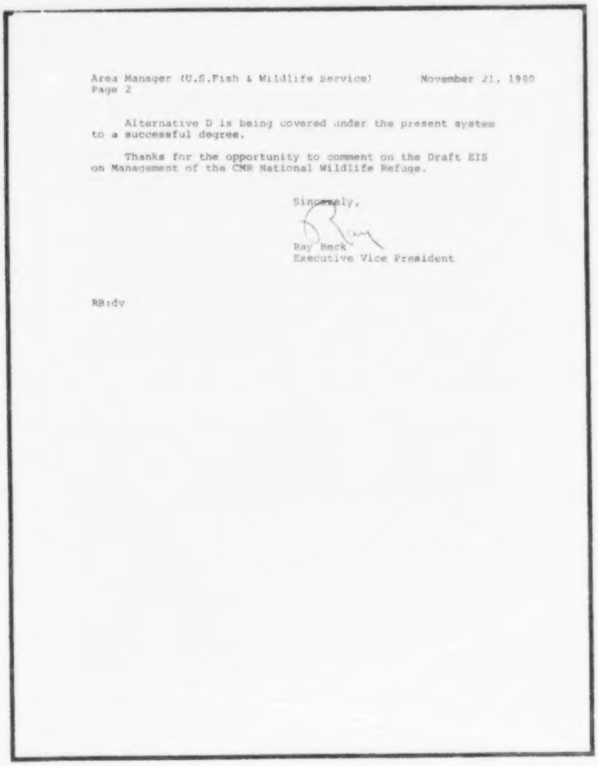
Area Manager
U.S. Fish & Wildlife Service
Room 3035, Federal Building
316 North 26th Avenue
Billings, Montana 59101

Re: Comments on the CMR Wildlife Refuge DEIS

The Montana Association of Conservation Districts would like to go on record in support of Alternative A (No action). Alternative A has provided a workable plan, that includes several federal and state agency land holdings along with private land holdings and allotments in the area. There have been problems that come about with the present system, however most of these problems have been solved with proper communication between agencies and the private individuals. It is also felt that Alternative D (Multiple Use) is covered by Alternative A.

Alternative B (Proposed Action) is totally unacceptable by the Conservation Districts. This alternative will reduce grazing by 33 percent occurring by 1985 with additional reductions proposed if wildlife objectives are not reached. The present planned reductions could result in at least six operators being forced out of business along with a loss in income of 134,000 to the federal government. A statement on page 79 states that the loss of livestock related income is insignificant on a regional basis. Whenever the U.S. Fish & Wildlife Service can remove a minimum of six livestock operators from business I would consider this anything but insignificant. Welfare recipients, who pay no taxes, are treated like kings by the government however individuals whose ancestors and themselves have worked the land and managed to survive everything including the paying of taxes to support the government are classified as insignificant. 1

Alternatives C & E are totally ridiculous and should not even be considered.



Area Manager (U.S.Fish & Wildlife Service) November 21, 1980
Page 2

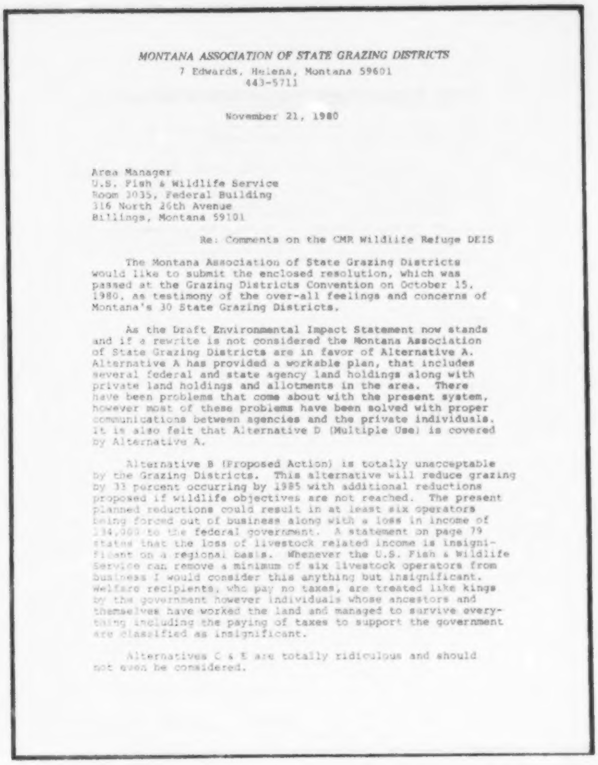
Alternative D is being covered under the present system to a successful degree.

Thanks for the opportunity to comment on the Draft EIS on Management of the CMR National Wildlife Refuge.

Sincerely,

Ray Beck
Executive Vice President

RB:dv



MONTANA ASSOCIATION OF STATE GRAZING DISTRICTS
7 Edwards, Helena, Montana 59601
443-5711

November 21, 1980

Area Manager
U.S. Fish & Wildlife Service
Room 3035, Federal Building
316 North 26th Avenue
Billings, Montana 59101

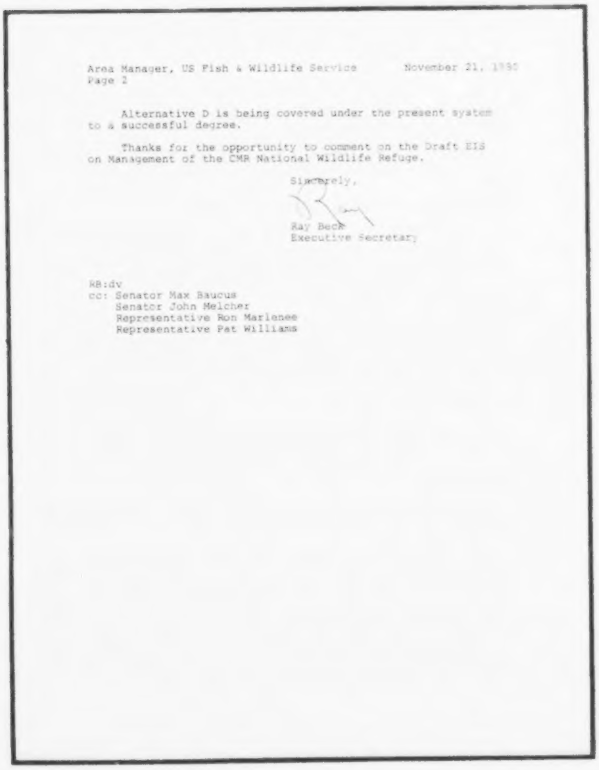
Re: Comments on the CMR Wildlife Refuge DEIS

The Montana Association of State Grazing Districts would like to submit the enclosed resolution, which was passed at the Grazing Districts Convention on October 15, 1980, as testimony of the over-all feelings and concerns of Montana's 30 State Grazing Districts.

As the Draft Environmental Impact Statement now stands and if a rewrite is not considered the Montana Association of State Grazing Districts are in favor of Alternative A. Alternative A has provided a workable plan, that includes several federal and state agency land holdings along with private land holdings and allotments in the area. There have been problems that come about with the present system, however most of these problems have been solved with proper communications between agencies and the private individuals. It is also felt that Alternative D (Multiple Use) is covered by Alternative A.

Alternative B (Proposed Action) is totally unacceptable by the Grazing Districts. This alternative will reduce grazing by 33 percent occurring by 1985 with additional reductions proposed if wildlife objectives are not reached. The present planned reductions could result in at least six operators being forced out of business along with a loss in income of 134,000 to the federal government. A statement on page 79 states that the loss of livestock related income is insignificant on a regional basis. Whenever the U.S. Fish & Wildlife Service can remove a minimum of six livestock operators from business I would consider this anything but insignificant. Welfare recipients, who pay no taxes, are treated like kings by the government however individuals whose ancestors and themselves have worked the land and managed to survive everything including the paying of taxes to support the government are classified as insignificant.

Alternatives C & E are totally ridiculous and should not even be considered.



Area Manager, US Fish & Wildlife Service November 21, 1980
Page 2

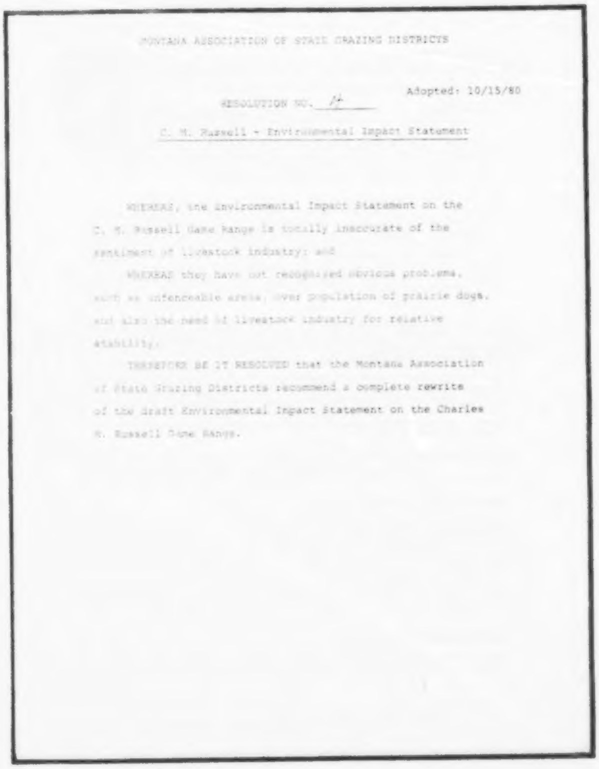
Alternative D is being covered under the present system to a successful degree.

Thanks for the opportunity to comment on the Draft EIS on Management of the CMR National Wildlife Refuge.

Sincerely,

Ray Beck
Executive Secretary

RB:dv
cc: Senator Max Baucus
Senator John Melcher
Representative Ron Marlenee
Representative Pat Williams



MONTANA ASSOCIATION OF STATE GRAZING DISTRICTS

Adopted: 10/15/80

RESOLUTION NO. 14

C. M. Russell - Environmental Impact Statement

WHEREAS, the Environmental Impact Statement on the C. M. Russell Game Range is totally inaccurate of the sentiment of livestock industry; and

WHEREAS they have not recognized obvious problems, such as unfenceable areas, over population of prairie dogs, and also the need of livestock industry for relative stability;

THEREFORE BE IT RESOLVED that the Montana Association of State Grazing Districts recommend a complete rewrite of the draft Environmental Impact Statement on the Charles M. Russell Game Range.

Response to the Montana Association of Conservation Districts and the Montana Association of State Grazing Districts *

* The comment letters from these two organizations are almost identical; therefore, they will be responded to as one.

1. The regional economic effects are insignificant because the relative change on the six county area is a very small percentage change. Thus to the region, there would be no perceptible change in key economic variables such as employment or income as a result of these alternatives. The absolute affect to a few individuals, as measured without reference to the size of the six county area, may be large. While this change is important to these individuals, it does not seriously affect the human environment of the study area because the absolute changes have a small relative effect.

HEARING STATEMENT

BY: THE MONTANA CHAPTER OF THE WILDLIFE SOCIETY
TO: U.S. DEPARTMENT OF INTERIOR, FISH AND WILDLIFE SERVICE
SUBJECT: CMR - DRAFT ENVIRONMENTAL IMPACT STATEMENT

The Montana Chapter of the Wildlife Society is a state subdivision of a national organization of practicing wildlife professionals with approximately 150 members throughout the state. Most members are employed by conservation agencies. Since this proposal addresses some wildlife problems in one area of the state, we appreciate this opportunity to provide constructive criticism of the draft EIS.

We consider the CMR to be extremely valuable. It is the largest piece of real estate in Montana with wildlife as its primary objective. In terms of numbers and variety of wild vertebrates it is likely the richest contiguous one million acres in our state. The refuge is unique because it is adjacent to about two million acres of public land managed by the Bureau of Land Management, an agency with a mandate to consider wildlife production as one of its multiple use objectives. The CMR is also unusual because of the low human population in the area and except for Ft. Peck Dam and its reservoir, the area is relatively undeveloped. It is possible to circumscribe an area around the CMR the size of New Jersey with a human population of less than one per square mile with a variety of mostly native plant communities. In all, the CMR survives as one of the largest shortgrass ecosystems in the U.S.

At this time the CMR is not an island of wildlife habitat. It is closely tied to the surrounding country and its wildlife condition is to a large extent dependent on this tie. Political pressures and administrative temptations to "stake out" the "CMR Wildlife Ranch" should be moderated by considerations of the CMR being part of a much larger wildlife environment. In time, human population and economic development pressures will probably isolate the CMR, but that time is at least several decades away and hopefully present refuge land and wildlife managers will be mature, professional, and sophisticated enough to take advantage of the current situation.

According to all available information, the combination, number, and variety, of vertebrates using the CMR is greater now than any time this century. This situation, it should be remembered, is not a result of any one wildlife management effort but more of a function of soil, water, climate, human population and economic conditions and an unusual number and variety of wildlife living areas which are in part the unconscious result of a lot of different, independent, small management efforts. There is a danger that a unified and homogenized management program will, again, unconsciously function to limit this number and variety of living areas thus restricting the wildlife resource. Guarding

the richness of the existing wildlife resource and protecting the naturalness of the area should be the first priorities.

There is a great need, more than ever before, for federal land managers to consult with local and state economic, agricultural, and wildlife interests. Management programs must be made somewhat consistent with local needs and desires.

We are not opposed to grazing on the CMR. As a matter of fact, we support livestock grazing as an consistent economic use of the vegetation resource. We are opposed to those actions, including livestock grazing, which damage the natural ecosystem, reduce the wildlife potential, or damage other public values. We believe that livestock grazing capacity should be determined by the grazing available on upland plateaus and benches. Coulees, sideslopes, and other steep terrain constitute the main deer and elk habitat and soils and vegetation in these areas are easily damaged by overgrazing.

In part II., Alternatives, we support most of the CMR goals (p.4). We are, however, skeptical about some things that may be included in Goals 4, 5, and 10. The term "goals" used in Goals 3, 8, and 9 should be called objectives. 1

We support the wildlife objectives (p. 5). However, since sage grouse and antelope use much the same habitat, sage grouse should be included in No. 5. The list should be extended to include a No. 12 for species of special interest which could include: bluebird, upland plover, mountain plover, poorwill, osprey, and possibly others. 2

In the range objectives, No. 1 states "Improve climax range conditions." The government has great power, but this can't be done! You may be able to improve present range condition toward climax. 3

ALTERNATIVE B (PROPOSED ACTION)

The Montana Chapter supports the goal of improving vegetation to enhance wildlife habitat. However, since this porposal depends heavily upon permittee's compliance with the terms of their grazing permits (livestock numbers, grazing season, and pasture management patterns), failure in this area negates the entire plan. Although CMR presently attempts to deal more strongly with noncompliance, the livestock management plans are a paper exercise. Without permittee compliance, this plan reverts to Alternative A (No Action).

ALTERNATIVE A (NO ACTION)

This proposal may be second best for wildlife, mainly because we know what is there now. If the many problems of compliance were

corrected under this alternative, there would be some vegetation improvement and wildlife benefit. The most serious consequence of this proposal is the continued deterioration of already damaged sites, mainly resulting from livestock management. We would prefer a fire control policy that would put better guidelines on which fires to fight and which to let burn themselves out.

ALTERNATIVE C (INTENSIVE WILDLIFE MANAGEMENT)

We are opposed to the fencing of the entire refuge boundary in this alternative. The grazing reductions appear to be greater than necessary to provide wildlife habitat. The intensive farming plan also violates the natural ecosystem guideline. We would be opposed to 38,000 acres of soil ripping on the same basis.

ALTERNATIVE D (MULTIPLE USE)

Supposedly the multiple use option and the no action option are not very different. The most damaging part of this proposal is the control exerted by livestock permittees over the use of forage. Most of the current problems are the result of one-sided policy favoring livestock use. Again, unless there is better control of permittee compliance, things out there on the ground would no change that much.

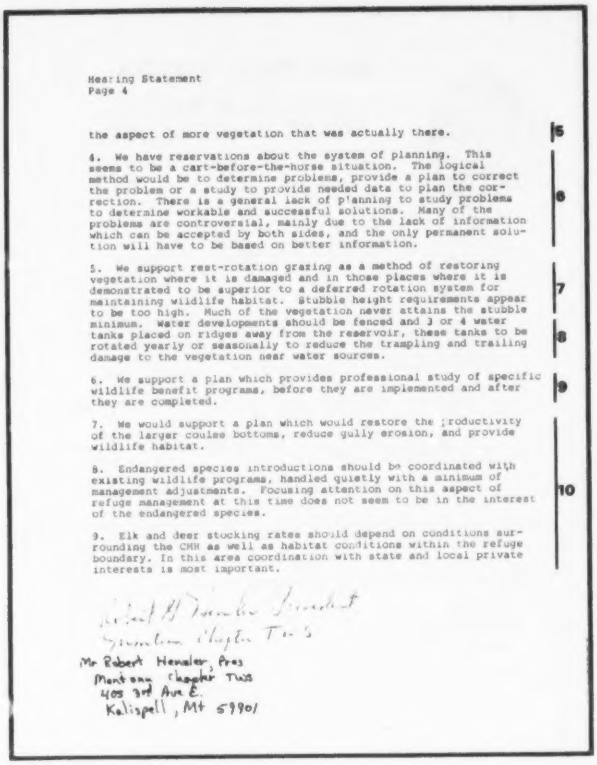
ALTERNATIVE E (NO GRAZING)

Without some prior study to indicate the need, we are opposed to a plan of prescribed burning. Soil ripping in this proposal is not necessary. We reiterate our support of grazing as a beneficial use of the vegetation resource.

OTHER COMMENTS

1. We have serious reservations about the ability of the FWS to enforce permittee compliance with the conditions of their grazing permits. 4

2. We have reservations about the results of the range survey that is the basis of the vegetation planning. The vegetation results have to be biased due to the above normal precipitation preceding the survey. Specified procedures were not followed in estimating vegetation production. The standards used in the survey may not be applicable to the area surveyed. Very little clipping was done to verify estimates. The relation between Appendix table 8-A and 8-B give virtually no indication of how the survey supports either the theoretical (8-A) or the actual (8-B) production and should be dropped from the final report. The range condition classes appear to be too high, primarily due to the extra weight given to robust perennials which provide 5



Hearing Statement
Page 4

the aspect of more vegetation that was actually there. 5

4. We have reservations about the system of planning. This seems to be a cart-before-the-horse situation. The logical method would be to determine problems, provide a plan to correct the problem or a study to provide needed data to plan the correction. There is a general lack of planning to study problems to determine workable and successful solutions. Many of the problems are controversial, mainly due to the lack of information which can be accepted by both sides, and the only permanent solution will have to be based on better information. 6

5. We support rest-rotation grazing as a method of restoring vegetation where it is damaged and in those places where it is demonstrated to be superior to a deferred rotation system for maintaining wildlife habitat. Stubble height requirements appear to be too high. Much of the vegetation never attains the stubble minimum. 7 Water developments should be fenced and 3 or 4 water tanks placed on ridges away from the reservoir, these tanks to be rotated yearly or seasonally to reduce the trampling and trailing damage to the vegetation near water sources. 8

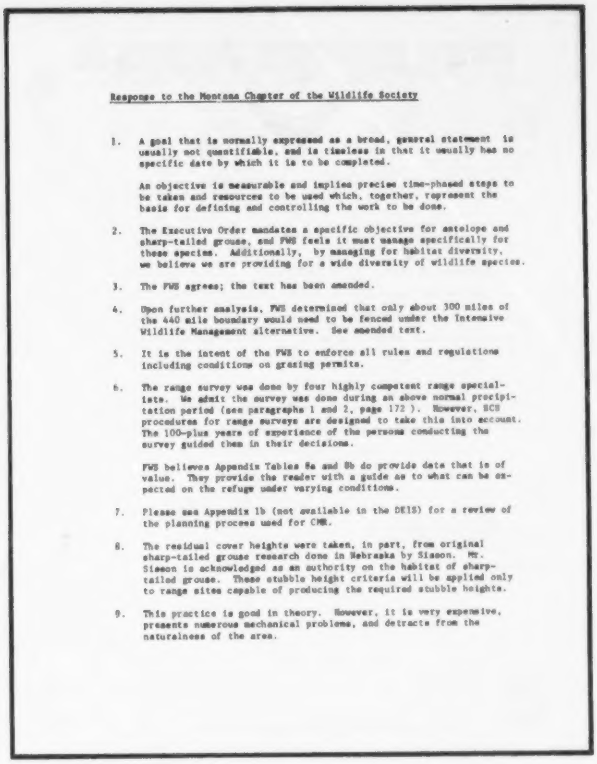
6. We support a plan which provides professional study of specific wildlife benefit programs, before they are implemented and after they are completed. 9

7. We would support a plan which would restore the productivity of the larger coulee bottoms, reduce gully erosion, and provide wildlife habitat.

8. Endangered species introductions should be coordinated with existing wildlife programs, handled quietly with a minimum of management adjustments. Focusing attention on this aspect of refuge management at this time does not seem to be in the interest of the endangered species. 10

9. Elk and deer stocking rates should depend on conditions surrounding the CMR as well as habitat conditions within the refuge boundary. In this area coordination with state and local private interests is most important.

Mr Robert Hensler, Pres
Montana Chapter TWS
405 3rd Ave E.
Kalispell, Mt 59901



Response to the Montana Chapter of the Wildlife Society

1. A goal that is normally expressed as a broad, general statement is usually not quantifiable, and is timeless in that it usually has no specific date by which it is to be completed.

   An objective is measurable and implies precise time-phased steps to be taken and resources to be used which, together, represent the basis for defining and controlling the work to be done.

2. The Executive Order mandates a specific objective for antelope and sharp-tailed grouse, and FWS feels it must manage specifically for these species. Additionally, by managing for habitat diversity, we believe we are providing for a wide diversity of wildlife species.

3. The FWS agrees; the text has been amended.

4. Upon further analysis, FWS determined that only about 300 miles of the 440 mile boundary would need to be fenced under the Intensive Wildlife Management alternative. See amended text.

5. It is the intent of the FWS to enforce all rules and regulations including conditions on grazing permits.

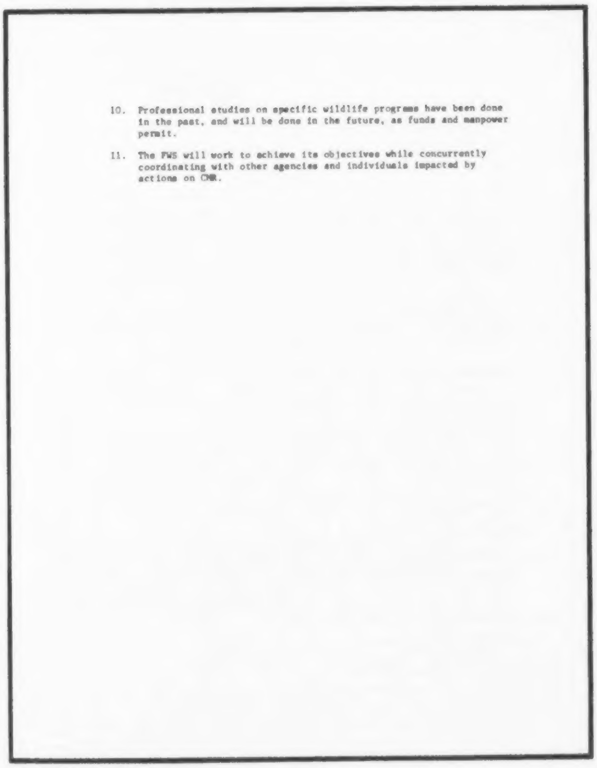
6. The range survey was done by four highly competent range specialists. We admit the survey was done during an above normal precipitation period (see paragraphs 1 and 2, page 172). However, SCS procedures for range surveys are designed to take this into account. The 100-plus years of experience of the persons conducting the survey guided them in their decisions.

   FWS believes Appendix Tables 8a and 8b do provide data that is of value. They provide the reader with a guide as to what can be expected on the refuge under varying conditions.

7. Please see Appendix 1b (not available in the DEIS) for a review of the planning process used for CMR.

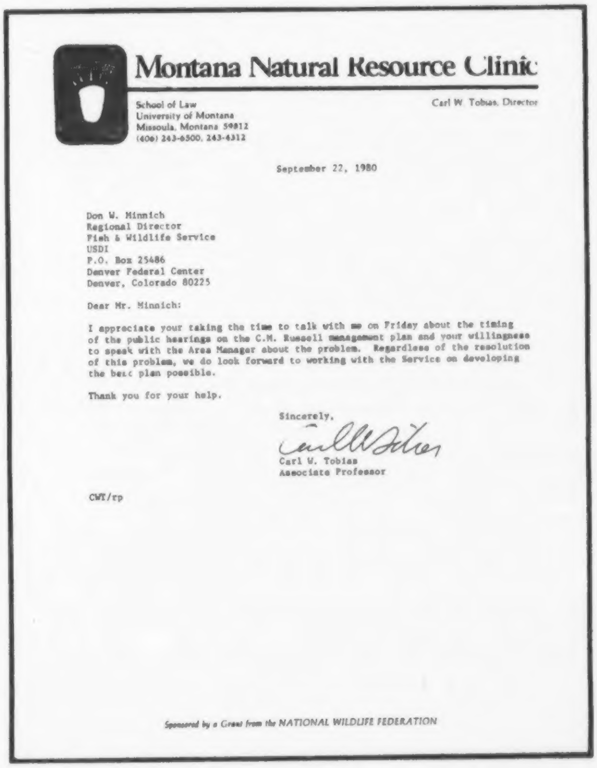
8. The residual cover heights were taken, in part, from original sharp-tailed grouse research done in Nebraska by Sisson. Mr. Sisson is acknowledged as an authority on the habitat of sharp-tailed grouse. These stubble height criteria will be applied only to range sites capable of producing the required stubble heights.

9. This practice is good in theory. However, it is very expensive, presents numerous mechanical problems, and detracts from the naturalness of the area.



10. Professional studies on specific wildlife programs have been done in the past, and will be done in the future, as funds and manpower permit.

11. The FWS will work to achieve its objectives while concurrently coordinating with other agencies and individuals impacted by actions on CMR.



Montana Natural Resource Clinic

School of Law
University of Montana
Missoula, Montana 59812
(406) 243-6500, 243-4312

Carl W. Tobias, Director

September 22, 1980

Don W. Minnich
Regional Director
Fish & Wildlife Service
USDI
P.O. Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Mr. Minnich:

I appreciate your taking the time to talk with me on Friday about the timing of the public hearings on the C.M. Russell management plan and your willingness to speak with the Area Manager about the problem. Regardless of the resolution of this problem, we do look forward to working with the Service on developing the best plan possible.

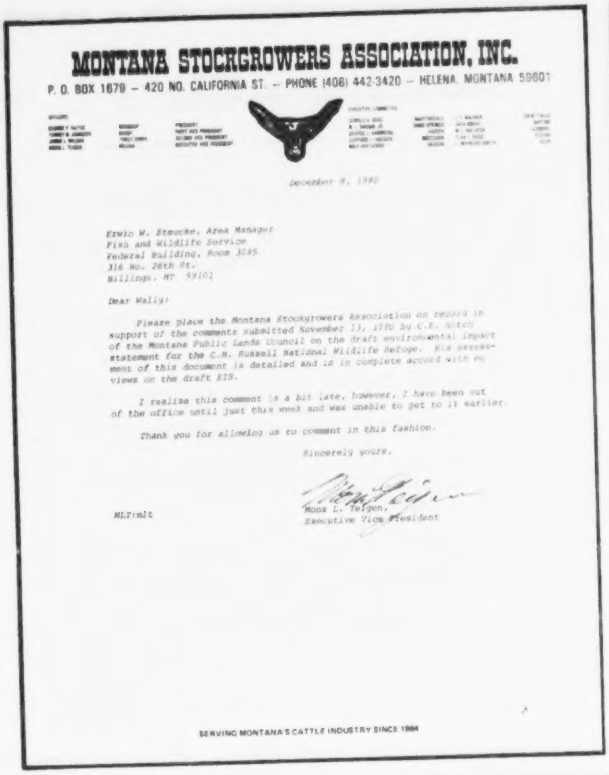
Thank you for your help.

Sincerely,

Carl W. Tobias
Associate Professor

CWT/rp

Sponsored by a Grant from the NATIONAL WILDLIFE FEDERATION



MONTANA STOCKGROWERS ASSOCIATION, INC.
P. O. BOX 1679 – 420 NO. CALIFORNIA ST. – PHONE (406) 442-3420 – HELENA, MONTANA 59601

December 9, 1980

Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3085
316 No. 26th St.
Billings, MT 59101

Dear Wally:

Please place the Montana Stockgrowers Association on record in support of the comments submitted November 13, 1980 by C.E. Kitch of the Montana Public Lands Council on the draft environmental impact statement for the C.M. Russell National Wildlife Refuge. His assessment of this document is detailed and is in complete accord with my views on the draft EIS.

I realize this comment is a bit late, however, I have been out of the office until just this week and was unable to get to it earlier.

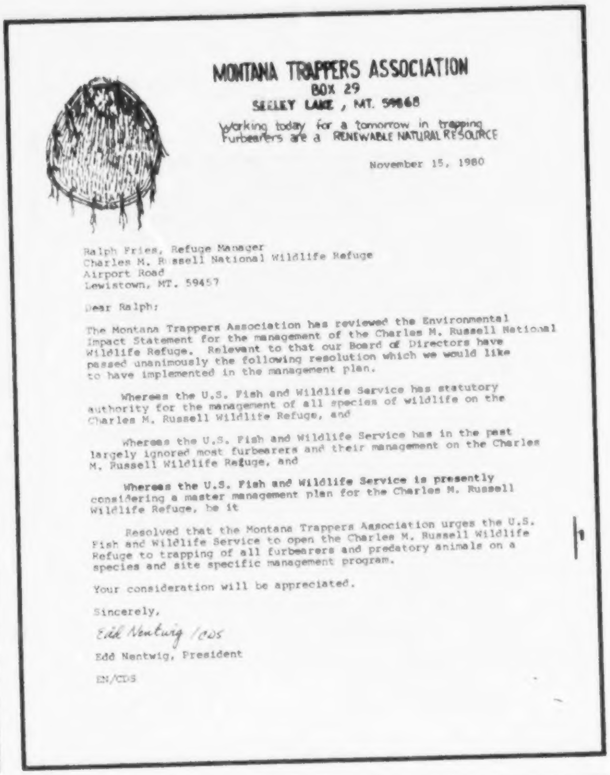
Thank you for allowing us to comment in this fashion.

Sincerely yours,

Mons L. Teigen,
Executive Vice President

MLT:mlt

SERVING MONTANA'S CATTLE INDUSTRY SINCE 1884



MONTANA TRAPPERS ASSOCIATION
BOX 29
SEELEY LAKE, MT. 59868
Working today for a tomorrow in trapping
Furbearers are a RENEWABLE NATURAL RESOURCE

November 15, 1980

Ralph Fries, Refuge Manager
Charles M. Russell National Wildlife Refuge
Airport Road
Lewistown, MT. 59457

Dear Ralph:

The Montana Trappers Association has reviewed the Environmental Impact Statement for the management of the Charles M. Russell National Wildlife Refuge. Relevant to that our Board of Directors have passed unanimously the following resolution which we would like to have implemented in the management plan.

Whereas the U.S. Fish and Wildlife Service has statutory authority for the management of all species of wildlife on the Charles M. Russell Wildlife Refuge, and

Whereas the U.S. Fish and Wildlife Service has in the past largely ignored most furbearers and their management on the Charles M. Russell Wildlife Refuge, and

Whereas the U.S. Fish and Wildlife Service is presently considering a master management plan for the Charles M. Russell Wildlife Refuge, be it

Resolved that the Montana Trappers Association urges the U.S. Fish and Wildlife Service to open the Charles M. Russell Wildlife Refuge to trapping of all furbearers and predatory animals on a species and site specific management program. 1

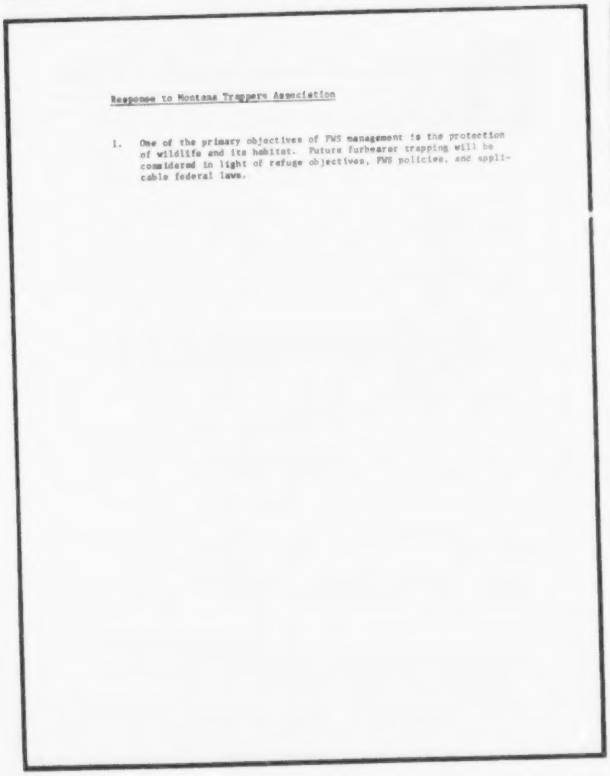
Your consideration will be appreciated.

Sincerely,

Edd Nentwig /CDS

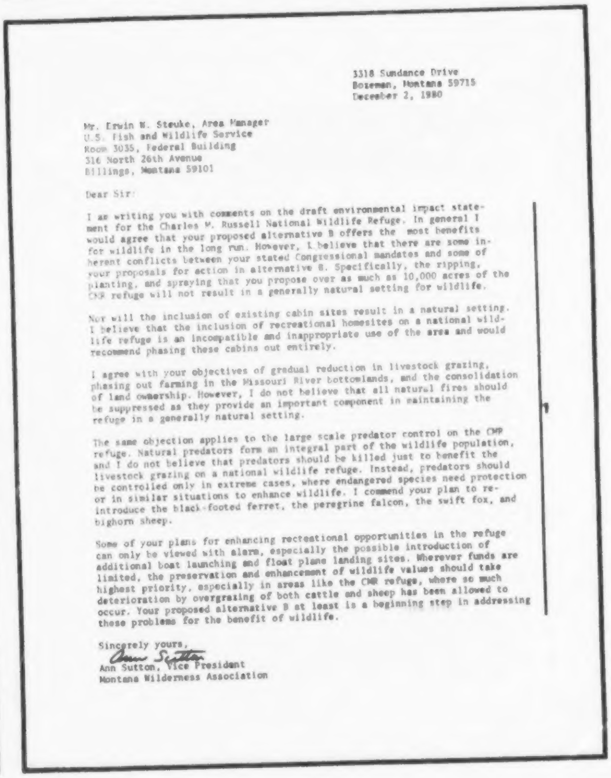
Edd Nentwig, President

EN/CDS



Response to Montana Trappers Association

1. One of the primary objectives of FWS management is the protection of wildlife and its habitat. Future furbearer trapping will be considered in light of refuge objectives, FWS policies, and applicable federal laws.



3318 Sundance Drive
Bozeman, Montana 59715
December 2, 1980

Mr. Erwin W. Steuke, Area Manager
U.S. Fish and Wildlife Service
Room 3035, Federal Building
316 North 26th Avenue
Billings, Montana 59101

Dear Sir:

I am writing you with comments on the draft environmental impact statement for the Charles M. Russell National Wildlife Refuge. In general I would agree that your proposed alternative B offers the most benefits for wildlife in the long run. However, I believe that there are some inherent conflicts between your stated Congressional mandates and some of your proposals for action in alternative B. Specifically, the ripping, planting, and spraying that you propose over as much as 10,000 acres of the CMR refuge will not result in a generally natural setting for wildlife.

Nor will the inclusion of existing cabin sites result in a natural setting. I believe that the inclusion of recreational homesites on a national wildlife refuge is an incompatible and inappropriate use of the area and would recommend phasing these cabins out entirely.

I agree with your objectives of gradual reduction in livestock grazing, phasing out farming in the Missouri River bottomlands, and the consolidation of land ownership. However, I do not believe that all natural fires should be suppressed as they provide an important component in maintaining the refuge in a generally natural setting. 1

The same objection applies to the large scale predator control on the CMR refuge. Natural predators form an integral part of the wildlife population, and I do not believe that predators should be killed just to benefit the livestock grazing on a national wildlife refuge. Instead, predators should be controlled only in extreme cases, where endangered species need protection or in similar situations to enhance wildlife. I commend your plan to reintroduce the black-footed ferret, the peregrine falcon, the swift fox, and bighorn sheep.

Some of your plans for enhancing recreational opportunities in the refuge can only be viewed with alarm, especially the possible introduction of additional boat launching and float plane landing sites. Wherever funds are limited, the preservation and enhancement of wildlife values should take highest priority, especially in areas like the CMR refuge, where so much deterioration by overgrazing of both cattle and sheep has been allowed to occur. Your proposed alternative B at least is a beginning step in addressing these problems for the benefit of wildlife.

Sincerely yours,
Ann Sutton
Ann Sutton, Vice President
Montana Wilderness Association

Response to Montana Wilderness Association

1. Please see responses to Defenders of Wildlife.

EDUCATION – CONSERVATION

Montana Wildlife Federation

AFFILIATE OF NATIONAL WILDLIFE FEDERATION

12/4/80

Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building
Billings, Mt. 59101

Willy
Dear Mr. Steucke:

Attached are the written comments of the Montana Wildlife Federation on the C.M.Russell draft environmental impact statement. Our organization represents over 1800 sportsmen and women in Montana, who have a keen interest in preserving wildlife, habitat and our sporting heritage.

I would be very willing to discuss any of our comments or any other comments on the DEIS with you or your staff whenever you feel it would be both helpful and productive. Our organization stands ready to assist in the preservation and maintenance of Montanas' wildlife resource whether on or off the C.M.Russell Wildlife Refuge.

If I can be of any further assistance please feel free to call.

Sincerely yours,
Wilbur W. Rehmann
Wilbur W. Rehmann
Executive Director
Montana Wildlife Federation

Box 901
Helena, MT 59601

THE WEALTH OF THE NATION IS IN ITS NATURAL RESOURCES
CONSERVATION DOES NOT END WITH CONVERSATION

The Montana Wildlife Federation supports the Fish and Wildlife Service eleven goals as outlined inthe DEIS, but we question the lack of specific details to achieve these goals. In fact, most of the goals, wildlife objectives, range objectives, and recreation objectives offer little supporting evidence or data. Further, many of the objectives appear as if they w are chosen arbitrarily. We expect to seemore evidence, either in a supplement, which has already been called for, or in an expanded final environmental impact statement. 1

The Federation compliments the Service for undertaking this monumental task of planning on the CMR, but we are dissatisfied with the EIS for the following reasons:

1. The EIS is grossly inadequate in its exploration of management alternatives.
2. There is an implied absolute confrontation between grazing by domestic livestock and wildlife which is unjustified. That confrontation seems to permeate the entire document. 2
3. The Federation objects to the use of mechanical range renovation, such as soil ripping, plowing, burning and furrowing as a management technique. We believe this conflicts with the Services' goal of "naturalness".
4. There is very little discussion of sport hunting and fishing as either a recreational resource or as a management tool. Further, what objectives must be met before hunting or fishing will occur? 3

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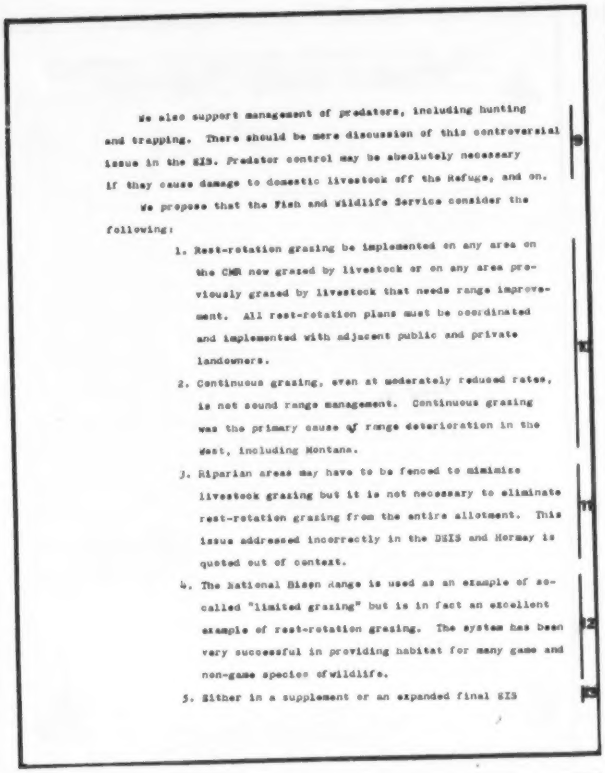
5. The economic analysis is more of a 'guestimate" than sound scientific analysis. Further data should be supplied and more sophisticated techniques should be used in order to more accurately predict both the costs and benefits. Are you in fact going to put six ranching operations out of business, no more, no less? Your evidence is very slim.
6. Is 'naturalness' really going to be adhered to or are other objectives such as the myriad introduced species and pen/pasture program going to give the CMR a "zoo-like ' look?

The Federation strongly feels that wildlife and wildlife habitat must receive primary attention both in the EIS and on the ground. All of the alternative management plans appear to be very general and focus heavily on livestock-range management rather than meeting specific wildife, habitat, or recreational goals.

To imply that any AUM taken away from livestock will automatically be used as food or cover by wildlife would be difficult if not impossible to demonstrate. 7

We support the reintroduction of endangered species such a s black-footed ferrets, peregrine falcons, and swift fox, but we question the wisdom of transplanting big-horn sheep since previous efforts have been largely unsuccessful.

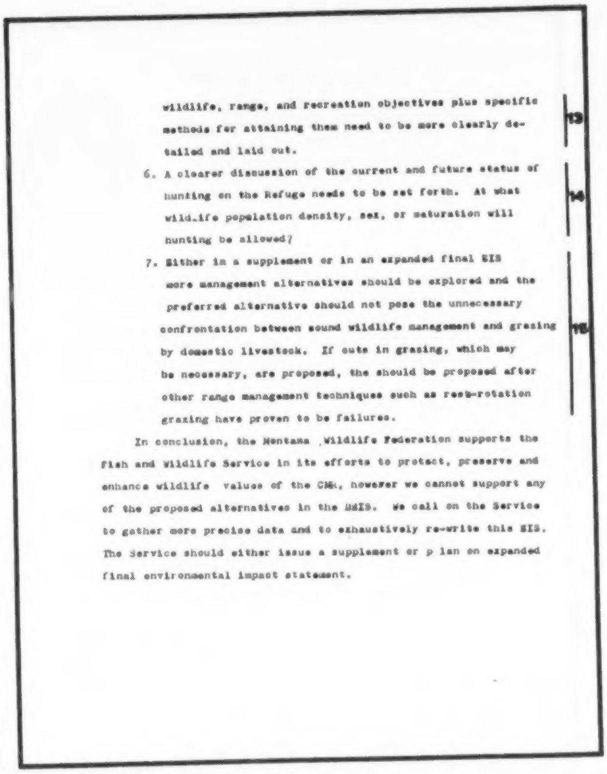
The elimination of farming operations along the Missouri River is another positive step. Along with such measures specific methods of re-establishing riparian habitat should be more thoroughly discussed.



We also support management of predators, including hunting and trapping. There should be more discussion of this controversial issue in the EIS. Predator control may be absolutely necessary if they cause damage to domestic livestock off the Refuge, and on. 9

We propose that the Fish and Wildlife Service consider the following:

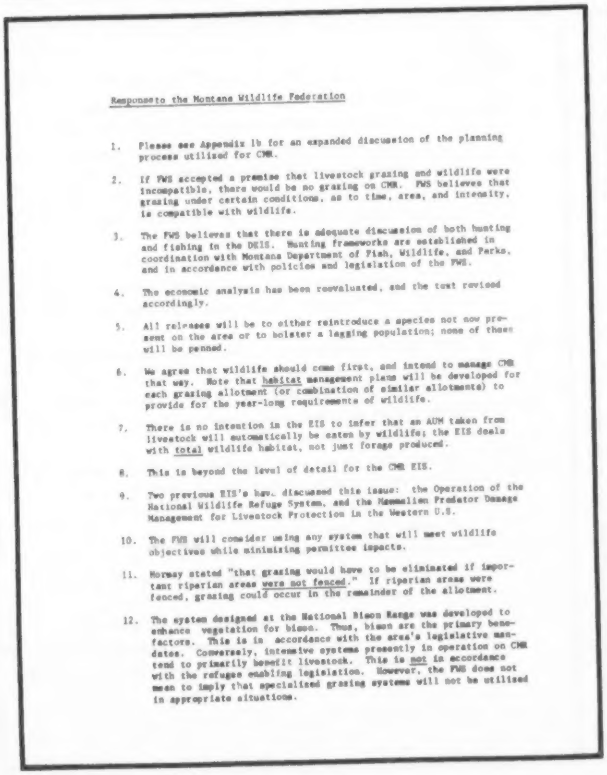
1. Rest-rotation grazing be implemented on any area on the CMR now grazed by livestock or on any area previously grazed by livestock that needs range improvement. All rest-rotation plans must be coordinated and implemented with adjacent public and private landowners. 10
2. Continuous grazing, even at moderately reduced rates, is not sound range management. Continuous grazing was the primary cause of range deterioration in the West, including Montana.
3. Riparian areas may have to be fenced to minimize livestock grazing but it is not necessary to eliminate rest-rotation grazing from the entire allotment. This issue addressed incorrectly in the DEIS and Hormay is quoted out of context. 11
4. The National Bison Range is used as an example of so-called "limited grazing" but is in fact an excellent example of rest-rotation grazing. The system has been very successful in providing habitat for many game and non-game species of wildlife. 12
5. Either in a supplement or an expanded final EIS 13



wildlife, range, and recreation objectives plus specific methods for attaining them need to be more clearly detailed and laid out. 13

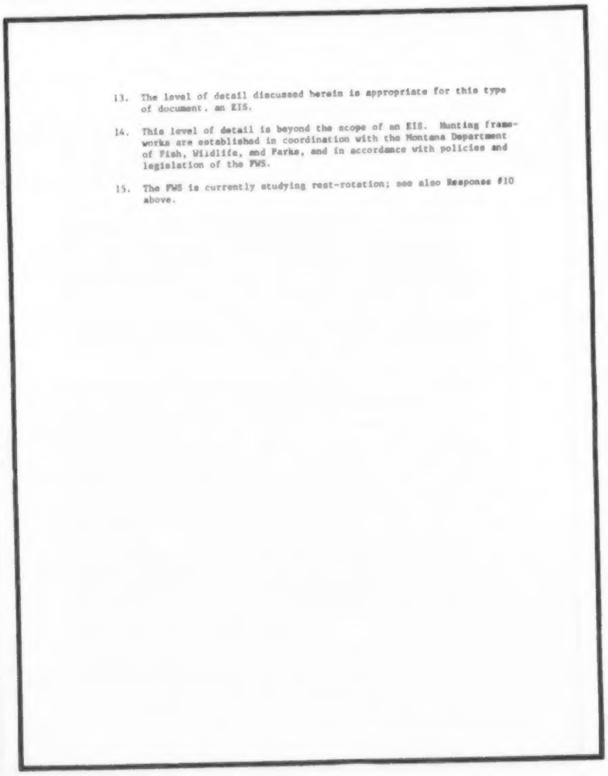
6. A clearer discussion of the current and future status of hunting on the Refuge needs to be set forth. At what wildlife population density, sex, or saturation will hunting be allowed? 14
7. Either in a supplement or in an expanded final EIS more management alternatives should be explored and the preferred alternative should not pose the unnecessary confrontation between sound wildlife management and grazing by domestic livestock. If cuts in grazing, which may be necessary, are proposed, the should be proposed after other range management techniques such as rest-rotation grazing have proven to be failures. 15

In conclusion, the Montana Wildlife Federation supports the Fish and Wildlife Service in its efforts to protect, preserve and enhance wildlife values of the CMR, however we cannot support any of the proposed alternatives in the DEIS. We call on the Service to gather more precise data and to exhaustively re-write this EIS. The Service should either issue a supplement or plan on expanded final environmental impact statement.

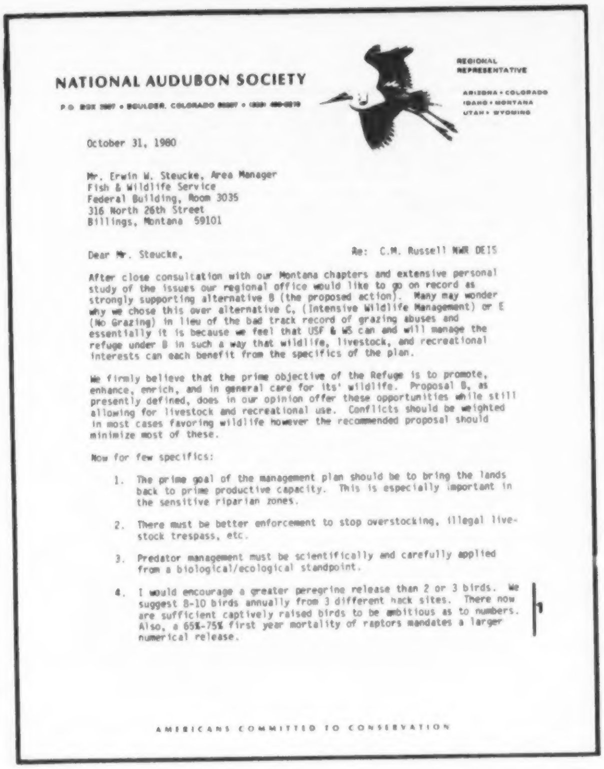


Responseto the Montana Wildlife Federation

1. Please see Appendix 1b for an expanded discussion of the planning process utilized for CMR.
2. If FWS accepted a premise that livestock grazing and wildlife were incompatible, there would be no grazing on CMR. FWS believes that grazing under certain conditions, as to time, area, and intensity, is compatible with wildlife.
3. The FWS believes that there is adequate discussion of both hunting and fishing in the DEIS. Hunting frameworks are established in coordination with Montana Department of Fish, Wildlife, and Parks, and in accordance with policies and legislation of the FWS.
4. The economic analysis has been reevaluated, and the text revised accordingly.
5. All releases will be to either reintroduce a species not now present on the area or to bolster a lagging population; none of these will be penned.
6. We agree that wildlife should come first, and intend to manage CMR that way. Note that habitat management plans will be developed for each grazing allotment (or combination of similar allotments) to provide for the year-long requirements of wildlife.
7. There is no intention in the EIS to infer that an AUM taken from livestock will automatically be eaten by wildlife; the EIS deals with total wildlife habitat, not just forage produced.
8. This is beyond the level of detail for the CMR EIS.
9. Two previous EIS's have discussed this issue: the Operation of the National Wildlife Refuge System, and the Mammalian Predator Damage Management for Livestock Protection in the Western U.S.
10. The FWS will consider using any system that will meet wildlife objectives while minimizing permittee impacts.
11. Hormay stated "that grazing would have to be eliminated if important riparian areas were not fenced." If riparian areas were fenced, grazing could occur in the remainder of the allotment.
12. The system designed at the National Bison Range was developed to enhance vegetation for bison. Thus, bison are the primary benefactors. This is in accordance with the area's legislative mandates. Conversely, intensive systems presently in operation on CMR tend to primarily benefit livestock. This is not in accordance with the refuges enabling legislation. However, the FWS does not mean to imply that specialized grazing systems will not be utilized in appropriate situations.



13. The level of detail discussed herein is appropriate for this type of document, an EIS.
14. This level of detail is beyond the scope of an EIS. Hunting frameworks are established in coordination with the Montana Department of Fish, Wildlife, and Parks, and in accordance with policies and legislation of the FWS.
15. The FWS is currently studying rest-rotation; see also Response #10 above.



NATIONAL AUDUBON SOCIETY
P.O. BOX [illegible] • BOULDER, COLORADO [illegible] • [illegible]

REGIONAL
REPRESENTATIVE

ARIZONA • COLORADO
IDAHO • MONTANA
UTAH • WYOMING

October 31, 1980

Mr. Erwin W. Steucke, Area Manager
Fish & Wildlife Service
Federal Building, Room 3035
316 North 26th Street
Billings, Montana 59101

Dear Mr. Steucke, Re: C.M. Russell NWR DEIS

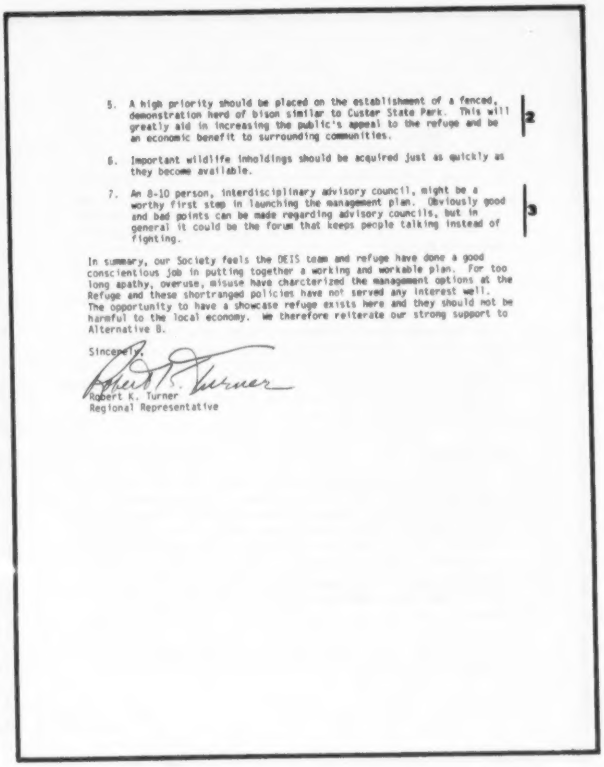
After close consultation with our Montana chapters and extensive personal study of the issues our regional office would like to go on record as strongly supporting alternative B (the proposed action). Many may wonder why we chose this over alternative C, (Intensive Wildlife Management) or E (No Grazing) in lieu of the bad track record of grazing abuses and essentially it is because we feel that USF & WS can and will manage the refuge under B in such a way that wildlife, livestock, and recreational interests can each benefit from the specifics of the plan.

We firmly believe that the prime objective of the Refuge is to promote, enhance, enrich, and in general care for its' wildlife. Proposal B, as presently defined, does in our opinion offer these opportunities while still allowing for livestock and recreational use. Conflicts should be weighted in most cases favoring wildlife however the recommended proposal should minimize most of these.

Now for few specifics:

1. The prime goal of the management plan should be to bring the lands back to prime productive capacity. This is especially important in the sensitive riparian zones.
2. There must be better enforcement to stop overstocking, illegal livestock trespass, etc.
3. Predator management must be scientifically and carefully applied from a biological/ecological standpoint.
4. I would encourage a greater peregrine release than 2 or 3 birds. We suggest 8-10 birds annually from 3 different hack sites. There now are sufficient captively raised birds to be ambitious as to numbers. Also, a 65%-75% first year mortality of raptors mandates a larger numerical release. 1

AMERICANS COMMITTED TO CONSERVATION



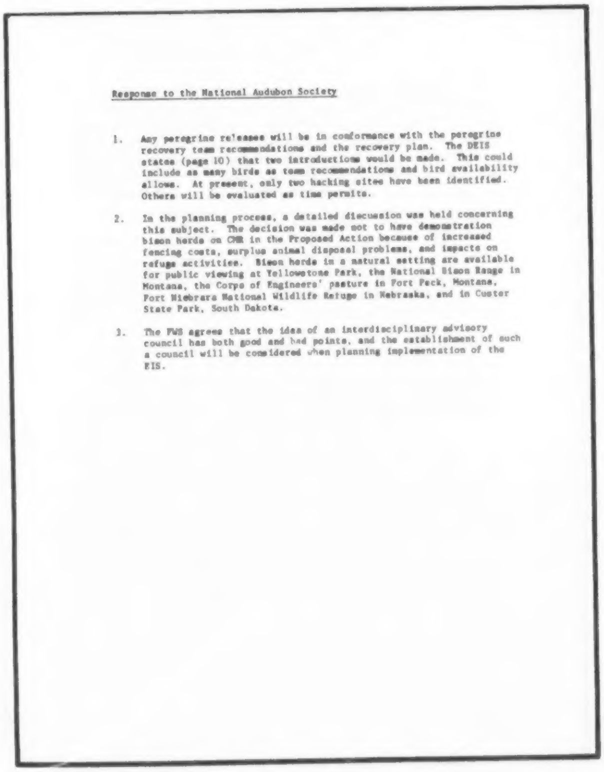
5. A high priority should be placed on the establishment of a fenced, demonstration herd of bison similar to Custer State Park. This will greatly aid in increasing the public's appeal to the refuge and be an economic benefit to surrounding communities. 2
6. Important wildlife inholdings should be acquired just as quickly as they become available.
7. An 8-10 person, interdisciplinary advisory council, might be a worthy first step in launching the management plan. Obviously good and bad points can be made regarding advisory councils, but in general it could be the forum that keeps people talking instead of fighting. 3

In summary, our Society feels the DEIS team and refuge have done a good conscientious job in putting together a working and workable plan. For too long apathy, overuse, misuse have charcterized the management options at the Refuge and these shortranged policies have not served any interest well. The opportunity to have a showcase refuge exists here and they should not be harmful to the local economy. We therefore reiterate our strong support to Alternative B.

Sincerely,

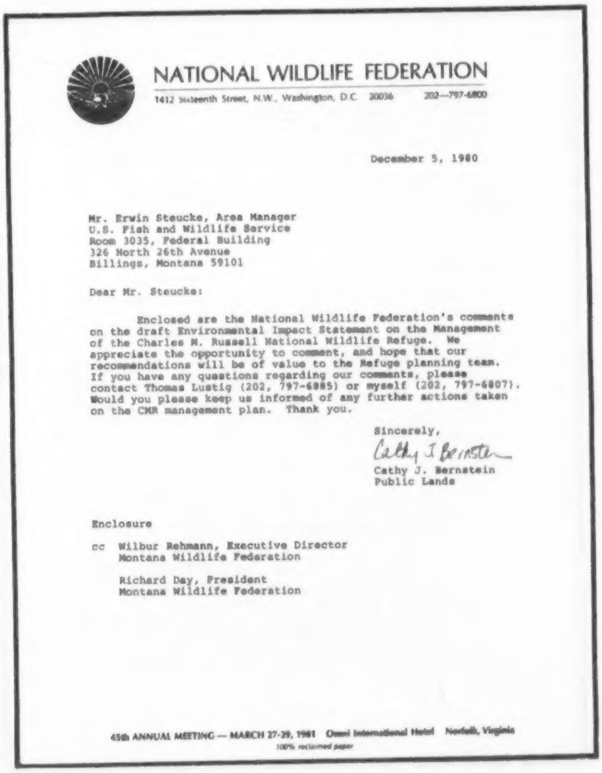
Robert K. Turner

Robert K. Turner
Regional Representative



Response to the National Audubon Society

1. Any peregrine releases will be in conformance with the peregrine recovery team recommendations and the recovery plan. The DEIS states (page 10) that two introductions would be made. This could include as many birds as team recommendations and bird availability allows. At present, only two hacking sites have been identified. Others will be evaluated as time permits.
2. In the planning process, a detailed discussion was held concerning this subject. The decision was made not to have demonstration bison herds on CMR in the Proposed Action because of increased fencing costs, surplus animal disposal problems, and impacts on refuge activities. Bison herds in a natural setting are available for public viewing at Yellowstone Park, the National Bison Range in Montana, the Corps of Engineers' pasture in Fort Peck, Montana, Fort Niobrara National Wildlife Refuge in Nebraska, and in Custer State Park, South Dakota.
3. The FWS agrees that the idea of an interdisciplinary advisory council has both good and bad points, and the establishment of such a council will be considered when planning implementation of the EIS.



NATIONAL WILDLIFE FEDERATION
1412 Sixteenth Street, N.W., Washington, D.C. 20036 202—797-6800

December 5, 1980

Mr. Erwin Steucke, Area Manager
U.S. Fish and Wildlife Service
Room 3035, Federal Building
326 North 26th Avenue
Billings, Montana 59101

Dear Mr. Steucke:

Enclosed are the National Wildlife Federation's comments on the draft Environmental Impact Statement on the Management of the Charles M. Russell National Wildlife Refuge. We appreciate the opportunity to comment, and hope that our recommendations will be of value to the Refuge planning team. If you have any questions regarding our comments, please contact Thomas Lustig (202, 797-6885) or myself (202, 797-6807). Would you please keep us informed of any further actions taken on the CMR management plan. Thank you.

Sincerely,

Cathy J. Bernstein

Cathy J. Bernstein
Public Lands

Enclosure

cc Wilbur Rehmann, Executive Director
Montana Wildlife Federation

Richard Day, President
Montana Wildlife Federation

45th ANNUAL MEETING — MARCH 27-29, 1981 Omni International Hotel Norfolk, Virginia
100% reclaimed paper

Comments of the National Wildlife Federation on the Draft Environmental Impact Statement on Management of the Charles M. Russell National Wildlife Refuge, U.S. Department of the Interior, Fish and Wildlife Service

The National Wildlife Federation welcomes this opportunity to comment on the Draft Environmental Impact Statement ("DES") on the Management of the Charles M. Russell National Wildlife Refuge in Montana.

The National Wildlife Federation ("NWF") with affiliates in all fifty states as well as Guam, Puerto Rico, and the Virgin Islands, and over 4 million members and supporters, is the largest nongovernmental conservation organization in the nation. NWF's Montana affiliate has approximately 1800 members, most of whom are hunters, fishermen, and/or wildlife observers. The Federation has a long history of active support for the improvement and preservation of wildlife habitat to optimize the size and diversity of wildlife populations.

Introduction

In recent years, the number of commercial and recreational users of the public lands has increased, placing a tremendous burden on the natural habitats to sustain their normal productivity, and threatening valuable natural resources. In the face of such resource conflicts, the Federation stresses the need to preserve representative areas of geological, biological, and ecological systems native to our country; and, to develop comprehensive habitat management programs which protect and enhance wildlife values.

The Charles M. Russell National Wildlife Refuge ("CMR") exemplifies this problem of resource conflicts on federal land.

Over the years, three different agencies have had partial or total control over CMR management. Between 1936 and 1975 the Refuge was under joint management of the Bureau of Land Management ("BLM") and the Fish and Wildlife Service ("FWS"). BLM took total control in 1975 through administrative action, but the following year Congress granted FWS exclusive jurisdiction over the Refuge. These administrative changes led to inconsistencies in the management of CMR and disregard for the initial purpose of this Refuge as set by President Roosevelt in 1936.[1]

At present, cattle graze freely over 50 percent of CMR Refuge while over 60 percent of the habitat is categorized as limiting to existing wildlife species. (DES, p. 39.) The Fish and Wildlife Service has proposed a management plan which would reduce grazing allotments and enhance wildlife resources, as well as "provide compatible human benefits associated with its wildlife and wildlands." (DES, p. 4.)

The National Wildlife Federation strongly supports the goals and objectives for CMR which are listed in the alternatives section of the DES (pp. 4-6) as well as the specific wildlife objectives of the proposed alternative (p. 80). These objectives satisfy NWF's policy for wildlife and rangeland management as well as complying with relevant federal laws (E.O. 7509, Establishing the Fort Peck Game Range; P.L. 94-223, National Wildlife Refuge System Administration Act of 1966; P.L. 89-669, National Wildlife Refuge System - Designation--discussed in the following text). The Federation agrees with FWS that wildlife conservation is the primary purpose of the Refuge, with livestock grazing allowed only when and to the extent compatible with this purpose. The CMR management plan has the opportunity to set a needed precedent for future management of wildlife refuges subject to pressure from commercial uses.

CMR History

Many of the conflicts involving past CMR management stemmed from differing interpretations of the Refuge's purpose. In 1936, President Roosevelt withdrew a 1.1 million-acre tract of Montana land from further settlement and designated this area as the Fort Peck Game Range (later changed to Charles M. Russell National Wildlife Range) to be managed "for the conservation and development of natural wildlife resources and for the protection and improvement of public grazing lands and natural forage resources." (E.O. 7509, 1 Fed. Reg. 2149, Dec. 16, 1936).

In his withdrawal, President Roosevelt provided:

> "that the natural forage resources therein shall be first utilized for the purpose of sustaining in a healthy condition a maximum of four hundred thousand (400,000) sharptail grouse, and one thousand five hundred (1,500) antelope, the primary species, and such nonpredatory secondary species in such numbers as may be necessary to maintain a balanced wildlife population. . . . Provided further, that all the forage resources within this range or preserve shall be available, except as herein otherwise provided with respect to wildlife, for domestic livestock. . . ." (Emphasis added.) (Executive Order 7509, Dec. 11, 1936, 1 Fed. Reg. 2149, Dec. 16, 1936.)

President Roosevelt's withdrawal made it clear that domestic livestock can graze on CMR only to the extent that they do not infringe upon the needs of wildlife, and that only forage not utilized by wildlife species should be available for livestock grazing. Roosevelt placed "the conservation and development of natural wildlife resources," as a primary reason for creating this Refuge and clearly expressed his concern that the Refuge be managed "to maintain a balanced wildlife population." (E.O. 7509).

In the years following Roosevelt's Executive Order, CMR management began favoring livestock uses over wildlife. In 1975, Interior Secretary Morton transferred total management authority for CMR to BLM which led to even more intense grazing activity. Grazing during this time became a primary activity on CMR, with over 50 percent of the AUM's designated for livestock grazing. As grazing increased, habitat for certain species of wildlife for which the Refuge was created deteriorated. (Congressional Record, Feb. 4, 1976, p. 2293; and Cong. Rec., Nov. 14, 1975, p. 36598.)

In an effort to reassert Roosevelt's initial goals for CMR, Congress transferred exclusive management authority for CMR to the Fish and Wildlife Service in 1976, under an amendment to the National Wildlife Refuge Administration Act. (P.L. 94-223, 16 U.S.C. 668dd, Feb. 27, 1976.) Congress, in granting exclusive CMR management authority to an agency designated by Congress (P.L. 93-271; 16 U.S.C. 742b) as "the guardian of our Nation's fish and wildlife resources at the federal level" (Congressional Record, Feb. 4, 1976, p. 9.2203), acknowledged CMR's primary purpose as wildlife protection.

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[1] Congressman Leggett (former Chairman of the House Subcommittee on Fisheries, Wildlife Conservation, and the Environment), in congressional debates on H.R. 5512 (P.L. 94-223) stated: ". . . BLM has administered these lands in the past by encouraging multiple uses other than Fish and Wildlife. It has particularly emphasized commercial uses such as grazing. . . . In contrast, the U.S. Fish and Wildlife Service's primary responsibilities both by law and in fact is to provide protection for wildlife and for wildlife habitat. . . . Consequently, there have been constant conflicts between the two agencies concerning how to manage these ranges (CMR Refuge, Kofa Game Range, Charles Sheldon Antelope Range). . . ." (16 U.S.C. 668dd, Feb. 27, 1976, p. 36597).

Habitat Deterioration Due to Grazing

At present, over 60% of the Refuge is categorized as limiting to wildlife species. This condition exists in part because of livestock grazing, and in part because of the natural geologic and topographic conditions of CMR terrain.

Over 50% of CMR consists of soil and landforms which are fragile and highly susceptible to runoff and erosion. Several thousand acres of panspots (soils high in salt and low in water infiltration capacity) exist on the Refuge. These areas generally do not produce large crops of standing vegetation. The low humidity and strong winds characteristic of the area tend to draw water from the soil, which increases the problem of low water retention.

The gradual increase in grazing AUM's over the years has placed an increased burden on the capacity of CMR soils to produce a healthy vegetative stock. Productivity rates, as stated, tend to be low on much of CMR terrain. As the cattle graze, they selectively remove palatable climax plant species, and in the process change the plant composition of the entire community. At present, only 51-75% of the plant species are representative of the normal climax community. Cattle, in grazing and trampling vegetation on steep terrain and riparian areas, increase runoff and erosion significantly. This action negatively affects fisheries by increasing sedimentation of streams and reservoirs.

At present, the habitat over most of CMR limits the nesting, foraging, and denning activities of existing wildlife species. The larger ungulates such as elk and bighorn sheep compete directly with cattle for forage. The cattle remove forb and grass species preferred by these ungulates. The wildlife species, overall, are limited by the lower plant species

diversity resulting from overgrazing. Clearly, there is a need on CMR for a habitat management plan which provides for a reduction in the cattle's degradation of wildlife habitat.

The conditions on CMR are typical of much of the 622 million grazeable acres in the eleven western states. Overgrazing in the western states has been a major factor in rangeland deterioration for many years. The climax grassland communities which originally supported large herds of bison, antelope, and quail have been replaced by subclimax stages which inhibit the productivity of these wildlife species.

FWS has the authority and legal obligation to reverse the deterioration on CMR. The National Wildlife Federation endorses the goals and effects expected from the DES proposed action (Table 13, at p. 80) as well as the FWS's effort to "preserve, restore, and manage in a generally natural setting a portion of the nationally significant Missouri River Breaks and associated ecosystem for optimum wildlife resources. . . ." (DES, p. 4.)

DES Alternatives

NWF used four criteria to evaluate the DES alternatives: (1) Does it satisfy the goals and objectives for CMR; (2) does it comply with existing law and FWS policy; (3) is it economically feasible; and (4) does it minimize the economic hardship on livestock operations on CMR?

Of the five alternatives discussed in the DES, only two fulfill the goals of CMR as mandated by Presidential and Congressional action: the proposed and the intensive management alternatives.

The no action and multiple-use alternatives both place the protection of wildlife values on an equal or subordinate position to other uses such as grazing or recreation. Neither provides significant improvement of the presently deteriorated wildlife habitat. and both would require legislation changing the existing Congressional and executive policy that the primary purpose of CMR is for wildlife.

The intensive management alternative would provide significant improvement in wildlife habitat, but is less economically feasible because substantial budget increases as well as changes in FWS policy would be necessary. Moreover, CMR grazing permittees would undergo greater economic hardship if the intensive management plan were fully implemented.

FWS has also incorporated a plan for federal acquisition of all private and state inholding on the Refuge into the intensive management scheme. This action would not only be prohibitively expensive, but would also require changes in Montana State Land Board Policy. For these reasons, NWF does not favor the intensive management alternative.

The Proposed Alternative

The proposed alternative recommends a 33% reduction in grazing AUM's, in addition to a number of other habitat management techniques. FWS studies indicate that under the proposed management plan, overall habitat quality in the Refuge will improve between 16 and 105%, depending on the particular wildlife species evaluated. Proposed ratings for security cover, nesting sites, and forage for individual wildlife species show a general increase from the fair to good category.

NWF supports these wildlife habitat improvements but recommends that FWS explore other alternatives which would achieve

the same objectives yet minimize the adverse economic impacts on existing livestock operations. Our support of the proposed alternative is contingent upon FWS's demonstration that no other alternative will achieve its goals and objectives while mitigating economic losses to existing grazers.

The Final Environmental Impact Statement ("FES") should evaluate certain alternatives to minimize disruption of existing grazing operations. For example, the option of utilizing a rest or deferred rotation system was mentioned in the DES, but not rigorously explore or evaluated. These rotation systems, as well as other alternatives which BLM and the Forest Service use to manage grazing on public lands, must be evaluated to see if they provide sufficient wildlife habitat improvement to meet FWS's goals and objectives. 1

If, after careful scrutiny of less burdensome alternatives, FWS determines that the goals and effects of the DES proposed alternative can best be achieved by the 33% reduction in grazing allotments, then it should be adopted with whatever means are appropriate to mitigate any resulting economic impact. If there are no methods to mitigate losses to existing ranchers and still achieve the wildlife purposes for which CMR was established, then the commercial interests must yield to the primary goal of wildlife management. Nonetheless, the elimination of existing commercial uses should not be undertaken unless justifiably necessary for wildlife enhancement and protection.

Additional Considerations

The proposed alternative also recommends a combined program of soil ripping, shrub and tree planting, prescribed burning, and fencing. These techniques are all designed to increase the diversity and plant productivity of the Refuge. The Federation generally supports these wildlife enhancement

-9-

measures, but requests that the FWS address the following points in the FES:

1) Fencing is particularly useful in protecting riparian areas from cattle infiltration, improving spawning habit for fish, securing nesting and feeding habitat for waterfowl, and decreasing stream sedimentation. NWF is concerned that fencing on CMR be designed so as not to impede the migration patterns of the large animals such as elk, antelope, and deer. 2

2) Some soil types characteristic of CMR such as panspots and dense clay sites do not promote high plant productivity. The proposed soil ripping process can be very effective in increasing the water retention capacity of the soil and thereby promoting plant productivity. However, in many cases ripping is only a temporary measure. The long term effectiveness of the soil ripping process depends on the environmental factors which have created these panspots and dense clay sites. FWS should explain the nature and causes of these panspots as well as evaluating alternatives to soil ripping. If soil ripping is the only possible alternative, FWS should ensure that there will be proper management of ripped areas so that they will not regress to low productivity areas. 3

3) The DES is deficient in its discussion of nongame species. The introduction to the alternatives section states that sharp-tailed grouse, mule deer, and pronghorn will be used as indicator species, and improvement in their habitats will mean improvements for eighty percent or more of other resident species. In discussing the alternatives, other game species (elk, white-tailed deer, upland birds) are often mentioned. However, the lack of discussion on nongame species suggests that the Refuge will be managed primarily for game species. NWF emphasizes the need for a balanced wildlife program which gives consideration to all species; both game and nongame. 4

-10-

4) NWF stresses the need to preserve and enhance vital waterfowl habitat. The reservoir provides habitat for osprey, cormorants, and great blue herons, while prairie falcons and golden eagles nest in cliffs along the breaks. In the initial habitat study, waterfowl on CMR received the lowest wildlife habitat ratings of any species or animal group on the Refuge. Vegetation, pond size, and nesting sites were all rated as poor, and therefore limiting to waterfowl. Although the management plan focuses on the improvement of mammalian habitat, the FES should clearly outline its management plans to enhance avian habitats, particularly for waterfowl. 5

5) The DES is inconsistent in its discussion of rangeland conditions. It states that CMR's range conditions on 74% of the grazing allotments are in good condition, and 18% in excellent condition. Range conditions for unallotted portions of CMR are categorized as "predominantly excellent." These statements are inconsistent with FWS's determination that over-grazing has caused sufficient deterioration in the condition of vegetation on the Refuge to warrant a 33% reduction in grazing allotments. FWS should clarify the discrepancy between these statements. 6

Summary

The National Wildlife Federation commends FWS on its efforts to protect, preserve, and enhance the wildlife values of CMR, but feels a more thorough exploration of management alternatives is necessary. Although NWF supports the wildlife/recreational objectives of the proposed alternative, we urge that, given the potential economic hardship which CMR livestock operators may undergo as a result of the proposed cut in allotments, FWS consider alternative management strategies in the FES which satisfy its goals and objectives, while minimizing economic hardship on livestock operators.

Response to National Wildlife Federation

1. Upon further study, FWS has concluded that it will not be necessary to acquire all private and state inholdings (see amended text).

2. There are presently six rest-rotation and two deferred grazing systems in operation on CMR. FWS believes these systems to be less effective for wildlife abundance and diversity than light seasonal grazing with a favorable season of use. Furthermore, intensive systems are a much more expensive alternative and detract more from naturalness than the type of grazing generally suggested in the Proposed Action. Two of these will be monitored intensively in the future to determine the applicability of these systems to wildlife habitat management.

3. All fencing on CMR will be in accordance with FWS standards for fences in wildlife areas. These standards were designed to provide for passage by wildlife to the extent possible.

4. After reviewing public comment and reexamining pertinent research, the FWS has concluded that soil ripping is not a viable manipulative technique for habitat management on CMR. All references to ripping have been deleted from the Proposed Action.

5. There is no intent to manage CMR primarily for game species. It became apparent by fulfilling the habitat requirements of sharp-tailed grouse and mule deer, the habitat requirements of many other wildlife species would be met. Improving habitat for these species on the many diverse vegetative sites provides for a diversity of wildlife and wildlife habitat.

6. CMR contains little waterfowl habitat or areas with feasible development potential. Intensive and expensive development of waterfowl habitat in the UL Bend area of the refuge is proposed for the Intensive Wildlife Management alternative, but is not believed appropriate for the Proposed Action because of concerns for cost and naturalness. The Proposed Action should raise existing ponds suitable for waterfowl from their present condition to good condition. Fort Peck Reservoir's value is providing habitat for molting and staging waterfowl. Few management options exist for enhancement of the reservoir.

7. Range condition was not the sole criterion used in determining the level of grazing found in the Proposed Action. Soil stability, degree of slope, distance from water, residual cover requirements, etc., were used to determine the amount of forage excess to the needs of wildlife. Presently, there is not a direct correlation on CMR between good range condition and good wildlife habitat for most species. Alternative B in the text proposes to correct this situation.

National
Wildlife Refuge
Association

P. O. Box 124
Winona, Minnesota 55987
507/454-5940

November 25, 1980

Mr. Erwin W. Steucke, Jr., Area Manager
U. S. Fish and Wildlife Service
Room 3035, Federal Building
316 North 26th Avenue
Billings, MT 59101

Dear Mr. Steucke:

The National Wildlife Refuge Association is a private, non-profit organization with a nationwide membership of people from all walks of life--people who have a common, fundamental concern for the preservation and perpetuation of our great National Wildlife Refuge System.

The National Wildlife Refuge Association is pleased to be able to comment on the Draft Environmental Impact Statement on the management of the Charles M. Russell National Wildlife Refuge. My comments reflect the opinions of Association members who have some knowledge of the management needs of the CMR Refuge, from both a professional and a user vantage.

The National Wildlife Refuge Association supports the natural management concept. This will leave the refuge essentially as it is now with no large scale water developments and no interior fences.

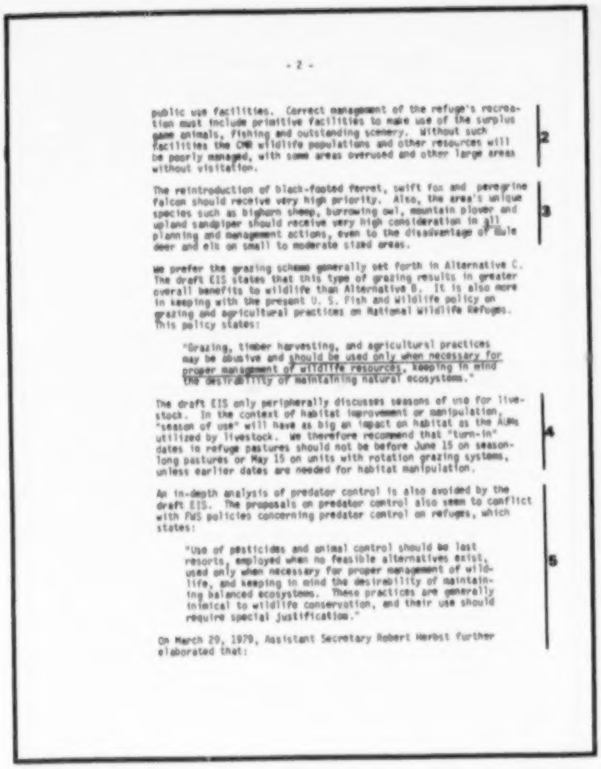
The National Wildlife Refuge Association strongly supports the overview statements on page 9, except for No. 3. These parameters will serve as logical guidance to many beneficial actions.

The Association supports Alternative B (Proposed Action) but modified to include some of the elements found in Alternative C (Intensive Wildlife Management).

For example, we cannot accept the statement that existing private cabins should remain. We suggest that they be phased out since such use is not compatible with the primary purpose of the CMR. Continued use of the cabin sites would also appear to be in violation of Title 43, Section 21, and Title 50, Section 26.35, of the Code of Federal Regulations. Neither can we endorse shrub planting or soil ripping because of high costs, except where endangered species would benefit from such practices. We support boundary fencing only if it is necessary to achieve habitat objectives that cannot be achieved in another manner. 1

We do not consider boat ramps and a well planned access road network to be incompatible but an essential part of the refuge's 2

Dedicated to the
preservation and
perpetuation of the
National Wildlife
Refuge System.



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public use facilities. Correct management of the refuge's recreation must include primitive facilities to make use of the surplus game animals, fishing and outstanding scenery. Without such facilities the CMR wildlife populations and other resources will be poorly managed, with some areas overused and other large areas without visitation. 2

The reintroduction of black-footed ferret, swift fox and peregrine falcon should receive very high priority. Also, the area's unique species such as bighorn sheep, burrowing owl, mountain plover and upland sandpiper should receive very high consideration in all planning and management actions, even to the disadvantage of mule deer and elk on small to moderate sized areas. 3

We prefer the grazing scheme generally set forth in Alternative C. The draft EIS states that this type of grazing results in greater overall benefits to wildlife than Alternative B. It is also more in keeping with the present U. S. Fish and Wildlife policy on grazing and agricultural practices on National Wildlife Refuges. This policy states:

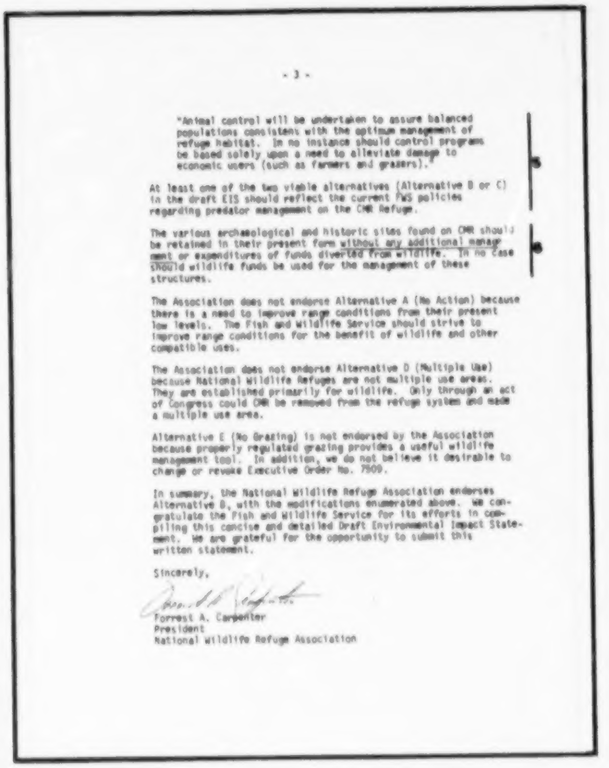
> "Grazing, timber harvesting, and agricultural practices may be abusive and should be used only when necessary for proper management of wildlife resources, keeping in mind the desirability of maintaining natural ecosystems."

The draft EIS only peripherally discusses seasons of use for livestock. In the context of habitat improvement or manipulation, "season of use" will have as big an impact on habitat as the AUMs utilized by livestock. We therefore recommend that "turn-in" dates in refuge pastures should not be before June 15 on season-long pastures or May 15 on units with rotation grazing systems, unless earlier dates are needed for habitat manipulation. 4

An in-depth analysis of predator control is also avoided by the draft EIS. The proposals on predator control also seem to conflict with FWS policies concerning predator control on refuges, which states:

> "Use of pesticides and animal control should be last resorts, employed when no feasible alternatives exist, used only when necessary for proper management of wildlife, and keeping in mind the desirability of maintaining balanced ecosystems. These practices are generally inimical to wildlife conservation, and their use should require special justification." 5

On March 29, 1979, Assistant Secretary Robert Herbst further elaborated that:



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> "Animal control will be undertaken to assure balanced populations consistent with the optimum management of refuge habitat. In no instance should control programs be based solely upon a need to alleviate damage to economic users (such as farmers and grazers)." 5

At least one of the two viable alternatives (Alternative B or C) in the draft EIS should reflect the current FWS policies regarding predator management on the CMR Refuge.

The various archaeological and historic sites found on CMR should be retained in their present form without any additional management or expenditures of funds diverted from wildlife. In no case should wildlife funds be used for the management of these structures. 6

The Association does not endorse Alternative A (No Action) because there is a need to improve range conditions from their present low levels. The Fish and Wildlife Service should strive to improve range conditions for the benefit of wildlife and other compatible uses.

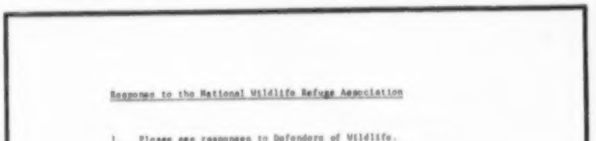
The Association does not endorse Alternative D (Multiple Use) because National Wildlife Refuges are not multiple use areas. They are established primarily for wildlife. Only through an act of Congress could CMR be removed from the refuge system and made a multiple use area.

Alternative E (No Grazing) is not endorsed by the Association because properly regulated grazing provides a useful wildlife management tool. In addition, we do not believe it desirable to change or revoke Executive Order No. 7509.

In summary, the National Wildlife Refuge Association endorses Alternative B, with the modifications enumerated above. We congratulate the Fish and Wildlife Service for its efforts in compiling this concise and detailed Draft Environmental Impact Statement. We are grateful for the opportunity to submit this written statement.

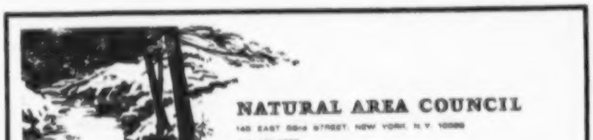
Sincerely,

Forrest A. Carpenter
President
National Wildlife Refuge Association



Response to the National Wildlife Refuge Association

1. Please see responses to Defenders of Wildlife.
2. Recreation facilities are included in all alternatives.
3. See response #1 above.
4. The FWS concurs with your recommendation.
5. The FWS will conform to its own policies on predator management. This subject has been addressed in two previous EIS's: Operation of the National Wildlife Refuge System, and Mammalian Predator Damage Management for Livestock Protection in the Western U.S.
6. The FWS is in agreement. Wildlife monies will not be used for the management of archeological and/or historic sites on CMR.



NATURAL AREA COUNCIL
[illegible] EAST [illegible] STREET, NEW YORK, N.Y. [illegible]
212 [illegible]

RICHARD H. POUGH, President

November 3, 1980

Mr. Erwin W. Steucke, Area Manager
U.S. Fish and Wildlife Service
Federal Building, Room 3085
316 North 26th Street
Billings, Montana 59101

Dear Mr. Steucke:

I appreciate receiving the draft environmental impact statement relative to the "Management of Charles M. Russell National Wildlife Refuge." It is certainly an impressive and, I would assume, very useful document.

May I, without going into great detail, make some general comments. In the light of the facts brought out in the enclosed paper, "Grazing and Haying Effects on Habitats of Upland Nesting Birds," by Kirsch, Duebbert and Kruse of your own Service, I wonder whether the refuge can be regarded as having any "excess forage" when viewed in the terms of wildlife's needs. 1

If there were no livestock on the refuge, it seems to me no predators, coyotes, etc., would need to be controlled. Any excess that tended to spill over into adjacent lands could certainly be taken care of by any of the ranching neighbors who feel the need to do so -- although a great many of them tell me they have nothing against the coyote. 2

I might also comment on the prairie dogs. Not only should they be encouraged in the interest of the black-footed ferret but also because the dog-town areas are important to the mountain plover as nesting areas. 3

If Executive Order 7509 needs to be changed, why not take steps to do so? It seems to me there is nothing sacred about it. Virtually the whole West is grazed by livestock. Why not have a few areas that aren't and let them return to, as nearly as possible, the condition they were in before the white man came to America with his livestock?

Sincerely yours,

Richard Pough

Richard H. Pough

Enclosure

ADVISORS ON LAND PRESERVATION / COUNSELORS ON IMAGINATIVE PHILANTHROPY

Response to Natural Area Council

1. The FWS believes the type and amount of livestock grazing suggested in the Proposed Action will achieve the wildlife and habitat objectives found on page 5 of the text. Objective 4 on this page will be monitored closely to determine if the level of grazing proposed is appropriate.

2. The predator problem has generally been related to livestock losses off the refuge.

3. The FWS recognizes the value of prairie dogs and their towns in wildlife management.

Natural Resources Defense Council, Inc.
25 KEARNY STREET
SAN FRANCISCO, CALIFORNIA 94108
415 421-6561

Washington Office
1725 I STREET, N.W.
SUITE 600
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202 223-8210

New York Office
122 EAST 42ND STREET
NEW YORK, N.Y. 10017
212 949-0049

January 13, 1981

Erwin W. Steucke, Area Manager
United States Fish & Wildlife Service
Federal Building, Room 3085
316 North 26th Street
Billings, Montana 59101

re: Draft Environmental Impact Statement/
Management of Charles M. Russell
National Wildlife Refuge

Dear Mr. Steucke:

I have reviewed the above-captioned document and wish to submit the following comments on its contents on behalf of the Natural Resources Defense Council, Inc. (NRDC), a non-profit, environmental membership organization. I appreciate your interest in receiving our written comments despite closure of the formal comment period.

NRDC has long been concerned about the management of livestock grazing on publicly-owned lands within and outside national wildlife refuges. We have been particularly concerned about grazing management on the Charles M. Russell National Wildlife Refuge (CMR), because of its spectacular resources. Indeed, as you may already know, evidence detailing the adverse impacts of the Bureau of Land Management's administration of grazing on the CMR's resources was submitted by us in connection with the lawsuit that led to the preparation of this draft Environmental Impact Statement (EIS), NRDC, et al v. Morton, et al., 388 F. Supp. 829 (D.D.C. 1974). We believed then, and still believe, that the EIS process would provide the Fish & Wildlife Service (FWS) with both the opportunity and the information needed to develop a management plan which would be tailored to its unique wildlife resources.

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The draft EIS substantiates our concerns. Clearly, livestock grazing has had, and is having, significant adverse effects on the wildlife of the CMR and is preventing the Refuge from fulfilling the objectives for which it was established. Equally clearly, changes in current management practices, including reductions in livestock numbers, are badly needed to fulfill those objectives as well as the FWS's policy regarding livestock use of refuges. While the proposed action recognizes this need for change, neither it nor the draft statement live up to our expectations for the the following reasons.

The draft's most serious flaw stems from its failure to comply with NEPA's most important objective -- the consideration of properly selected alternatives. See, e.g., Council on Environmental Quality, Regulations for Implementing the Procedural Provisions of the Procedural Provisions of the National Environmental Policy Act, §§ 1502.14.

The draft purports to consider four "alternatives" in addition to the Service's proposed action. Two of the four, the no action alternative and the multiple use alternative, admittedly "do not provide a wildlife refuge situation." P. 26. According to the draft, the Service lacks the authority to implement the no grazing alternative.* The remaining alternative, the intensive wildlife management alternative, is not only extremely expensive, but would also violate CMR's stated mission, by "destroy[ing] the naturalness of the Refuge." Id.

Thus, the draft considers only one viable alternative -- the proposed action. Obviously, consideration of a single such alternative does not comply with the requirements of NEPA or the CEQ Regulations. Equally obviously, the proposed action is not the only viable alternative for management of grazing on the CMR. Accordingly, we specifically request the consideration of at least

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*I believe that the Service does, in fact have the authority to eliminate grazing on the CMR. Nonetheless, this alternative would be extremely difficult and expensive to implement.

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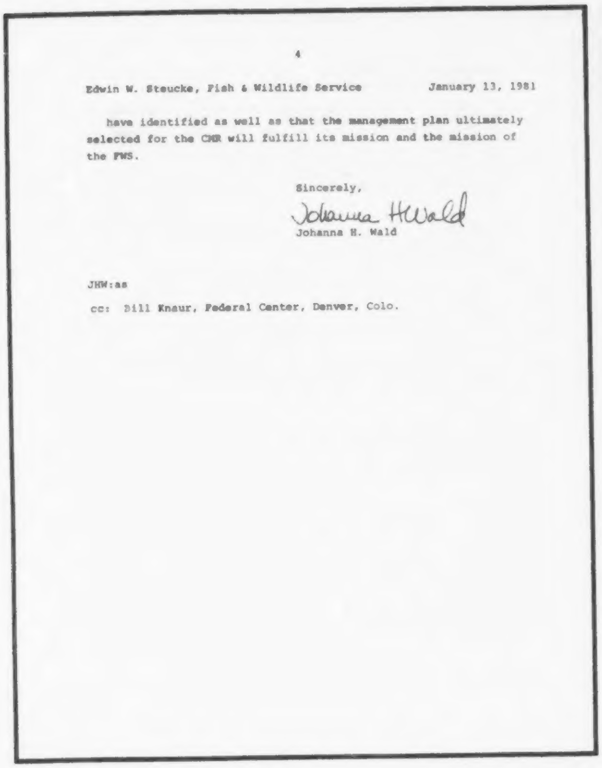
one additional alternative in the final EIS which involves use of carefully designed prescriptive grazing to achieve or maintain desired wildlife habitat conditions. This alternative should not involve either the unrealistic acquisition plan or the other management practices that make alternative C unacceptable. In addition, it should directly address the existing conflicts between livestock and wildlife use of key areas, including, in particular, riparian areas.

The draft EIS acknowledges the importance of riparian areas to CMR's wildlife. See, e.g., p. viii. It also reveals that they are currently considered "sacrifice areas" as the result of cattle concentrations. P. 16. Notwithstanding the proposed 33% reduction in livestock use, it is not at all clear that the proposed management will adequately protect these areas and achieve optimum wildlife conditions. In part, this is the result of the draft's failure to explain how the proposed level of use was determined. It is also the result of its failure to provide at least habitat-specific descriptions of the management actions contemplated by the proposed action as well as to analyze the impacts of the proposed action and "alternatives" in such terms.

As far as other elements of the Service's plan are concerned, we support the reintroduction of endangered species in the Refuge, the minimization of so-called range "improvements," and the phasing-out of farming especially along the Missouri River bottoms. We are opposed, however, to predator control practices except where necessary to protect endangered species as well as to the proposal to "rip" as many as 10,000 acres of CMR to improve vegetative productivity. The proposed action regarding predator control is inconsistent with FWS policy while the proposed ripping conflicts with the stated mission of CMR.

In conclusion, we appreciate the opportunity to submit these comments. We hope that the final EIS will remedy the problems



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Edwin W. Steucke, Fish & Wildlife Service   January 13, 1981

have identified as well as that the management plan ultimately selected for the CMR will fulfill its mission and the mission of the FWS.

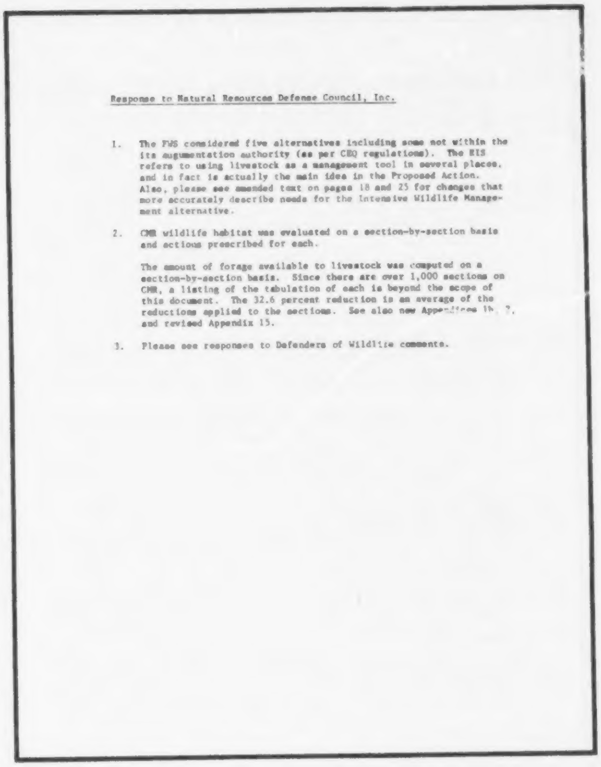
Sincerely,

Johanna H Wald

Johanna H. Wald

JHW:as

cc: Bill Knaur, Federal Center, Denver, Colo.



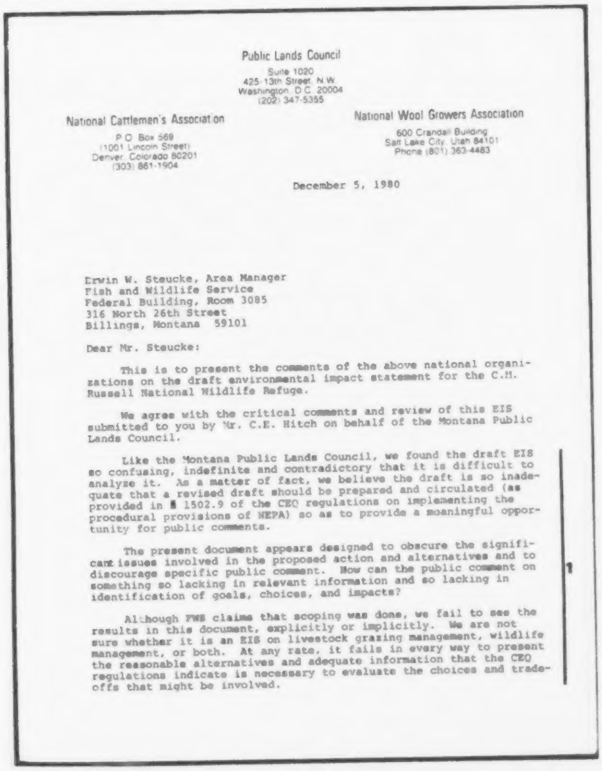
Response to Natural Resources Defense Council, Inc.

1. The FWS considered five alternatives including some not within the its augumentation authority (as per CEQ regulations). The EIS refers to using livestock as a management tool in several places, and in fact is actually the main idea in the Proposed Action. Also, please see amended text on pages 18 and 25 for changes that more accurately describe needs for the Intensive Wildlife Management alternative.

2. CMR wildlife habitat was evaluated on a section-by-section basis and actions prescribed for each.

   The amount of forage available to livestock was computed on a section-by-section basis. Since there are over 1,000 sections on CMR, a listing of the tabulation of each is beyond the scope of this document. The 32.6 percent reduction is an average of the reductions applied to the sections. See also new Appendices 16, 7, and revised Appendix 15.

3. Please see responses to Defenders of Wildlife comments.



Public Lands Council
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Washington, D.C. 20004
(202) 347-5355

National Cattlemen's Association
P.O. Box 569
(1001 Lincoln Street)
Denver, Colorado 80201
(303) 861-1904

National Wool Growers Association
600 Crandall Building
Salt Lake City, Utah 84101
Phone (801) 363-4483

December 5, 1980

Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3085
316 North 26th Street
Billings, Montana 59101

Dear Mr. Steucke:

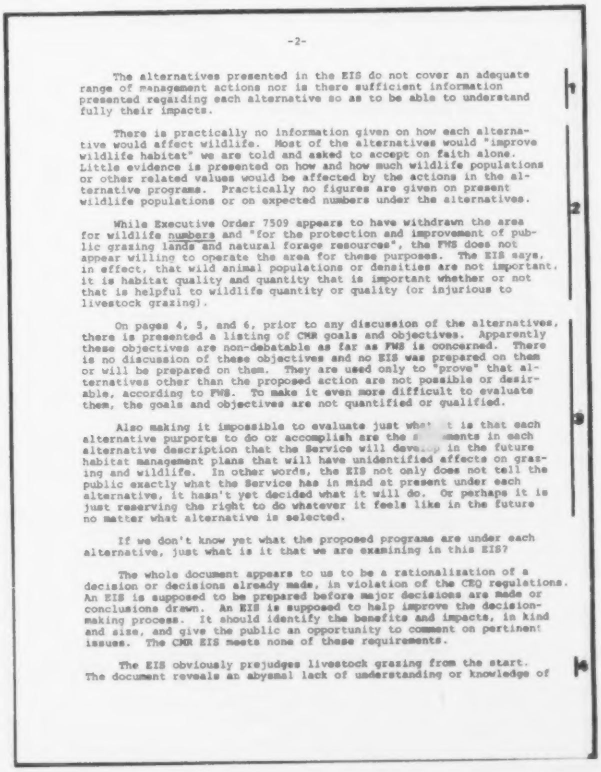
This is to present the comments of the above national organizations on the draft environmental impact statement for the C.M. Russell National Wildlife Refuge.

We agree with the critical comments and review of this EIS submitted to you by Mr. C.E. Hitch on behalf of the Montana Public Lands Council.

Like the Montana Public Lands Council, we found the draft EIS so confusing, indefinite and contradictory that it is difficult to analyze it. As a matter of fact, we believe the draft is so inadequate that a revised draft should be prepared and circulated (as provided in § 1502.9 of the CEQ regulations on implementing the procedural provisions of NEPA) so as to provide a meaningful opportunity for public comments.

The present document appears designed to obscure the significant issues involved in the proposed action and alternatives and to discourage specific public comment. How can the public comment on something so lacking in relevant information and so lacking in identification of goals, choices, and impacts? 1

Although FWS claims that scoping was done, we fail to see the results in this document, explicitly or implicitly. We are not sure whether it is an EIS on livestock grazing management, wildlife management, or both. At any rate, it fails in every way to present the reasonable alternatives and adequate information that the CEQ regulations indicate is necessary to evaluate the choices and tradeoffs that might be involved.



-2-

The alternatives presented in the EIS do not cover an adequate range of management actions nor is there sufficient information presented regarding each alternative so as to be able to understand fully their impacts. 1

There is practically no information given on how each alternative would affect wildlife. Most of the alternatives would "improve wildlife habitat" we are told and asked to accept on faith alone. Little evidence is presented on how and how much wildlife populations or other related values would be affected by the actions in the alternative programs. Practically no figures are given on present wildlife populations or on expected numbers under the alternatives. 2

While Executive Order 7509 appears to have withdrawn the area for wildlife numbers and "for the protection and improvement of public grazing lands and natural forage resources", the FWS does not appear willing to operate the area for these purposes. The EIS says, in effect, that wild animal populations or densities are not important, it is habitat quality and quantity that is important whether or not that is helpful to wildlife quantity or quality (or injurious to livestock grazing).

On pages 4, 5, and 6, prior to any discussion of the alternatives, there is presented a listing of CMR goals and objectives. Apparently these objectives are non-debatable as far as FWS is concerned. There is no discussion of these objectives and no EIS was prepared on them or will be prepared on them. They are used only to "prove" that alternatives other than the proposed action are not possible or desirable, according to FWS. To make it even more difficult to evaluate them, the goals and objectives are not quantified or qualified. 3

Also making it impossible to evaluate just what it is that each alternative purports to do or accomplish are the statements in each alternative description that the Service will develop in the future habitat management plans that will have unidentified affects on grazing and wildlife. In other words, the EIS not only does not tell the public exactly what the Service has in mind at present under each alternative, it hasn't yet decided what it will do. Or perhaps it is just reserving the right to do whatever it feels like in the future no matter what alternative is selected.

If we don't know yet what the proposed programs are under each alternative, just what is it that we are examining in this EIS?

The whole document appears to us to be a rationalization of a decision or decisions already made, in violation of the CEQ regulations. An EIS is supposed to be prepared before major decisions are made or conclusions drawn. An EIS is supposed to help improve the decision-making process. It should identify the benefits and impacts, in kind and size, and give the public an opportunity to comment on pertinent issues. The CMR EIS meets none of these requirements.

The EIS obviously prejudges livestock grazing from the start. 4
The document reveals an abysmal lack of understanding or knowledge of

livestock grazing or range science issues. Perhaps this is because there appears to have been little input from anyone other than wildlife specialists. (The list of preparers on page 104 fails to reveal each individual's experience and qualifications as required by the CEQ regulations. 4

Examples of the ignorance of livestock and range issues appear in the discussion of economics in Appendix 13: Private rates for grazing are $10 to $20 per AUM in the area and since the CMR permittees pay only $1.89 per AUM they are getting "substantial federal subsidies." Anyone who had even a modicum of understanding of the public land grazing fee formula would not make such a stupid statement. (For your enlightment, the formula is based on private lease rates and the higher costs of operating on public land.) The error is compounded when $1.89 per AUM is used as the direct benefit value. We believe that this proves that FWS is incapable of analyzing livestock issues and at least that part of the EIS should be given to another Federal agency or to a range science group outside the government that has some expertise in livestock grazing and range matters. 5

Four of the five alternatives involve cuts in livestock grazing. The fifth, the "no action" alternative, involves a continuation of the status quo (no livestock grazing increase). The multiple use alternatives is misnamed. At one point, it is described as an action involving an initial cut and a gradual increase to a level slightly below present grazing numbers; on some other pages the high point is described as a few AUMs above present numbers. There is also a variety of figures given on the amounts of the livestock reductions in other alternatives.

It is apparently accepted as a premise that livestock grazing and wildlife are incompatible. Since this is such a central issue it should have been more adequately covered in the document. 6

The literature review in Appendix 16 attempts to substantiate the above bias by citing out-of-context selections from wildlife writers. Dr. R.J. Mackie is quoted extensively in this appendix and throughout the rest of the document in words that imply that he believes livestock and wildlife are always in conflict. However, that same Dr. Mackie is cited as indicating that information is lacking with respect to impacts of grazing on wild ungulates. We understand that Dr. Mackie has recently stated that existing studies have not produced substantive evidence for the existence of livestock/wildlife competition generally, nor more than very general conclusions about the exact nature and importance of such competition.

Appendix 16 also reveals that those cited are saying that there may be diet and other competition between wildlife and livestock in "overgrazed" situations--not all situations! But the EIS reveals that 85 to 95% of the range in the CMR Refuge is in "good" or "excellent" condition! 7

It is obvious that the severe grazing reductions in the Proposed Action are not directed at "overgrazed" conditions. As a matter of fact, a comparison between the proposed cuts and the range condition allotments by allotment indicate that there would be severe reductions in areas in which all the land is in good or excellent condition.

This study shows there is no correlation between allotment range conditions and proposed grazing reductions in the Proposed Action.

We also found no information in the document on range trend nor any substantiation of the assertion that the Proposed Action would increase the amount of land in "excellent" range condition. We recognize that the EIS makes a differentiation in a couple of places between range condition and habitat condition. "Poor" range condition is best for prairie dogs, it indicates. But it is impossible to track just how and how much FWS is going to decrease range conditions under the Proposed Action in order to increase habitat conditions! 7

In summary, for the reasons mentioned in this letter and in the letter from the Montana Public Lands Council, we believe that it is imperative that the draft statement be discarded and a more intelligible draft statement be prepared.

Sincerely,

Ronald A. Michieli

Ronald A. Michieli
Director, Government Affairs
For Land and Natural Resources;
NCA Executive Director, Public
Lands Council

RAM/mes

Response to Public Lands Council, National Cattlemen's Association, and National Woolgrower's Association

1. As stated in the Foreword, "This Environmental Impact Statement follows the Council of Environmental Quality guidelines for National Environmental Policy Act documents as amended July 30, 1979." The EPA rated this document as LO-1 (Lack of Objection - sufficient information); therefore, FWS believes the document is adequate.

   Scoping was completed as outlined in the last paragraph on page 1. . The Multiple Use alternative was a direct result of the scoping process, i.e., many persons expressed a desire to have the refuge under the multiple use concept.

   Wildlife management and livestock grazing on CMR are inseparable. Thus, the EIS covers both aspects.

2. The EIS purposefully does not address population numbers but wildlife habitat (see page 1, Foreword, paragraph 4). The effects of the five alternative actions on wildlife habitat are discussed in the Wildlife Habitat-Range Resources section of the consequences of each alternative. Wildlife populations are modified by actions of man as well as nature.

   Executive Order 7509 established CMR for "the conservation and development of natural wildlife resources and for the protection and improvement of public grazing lands and natural forage resources." The Executive Order further establishes two priority wildlife species and that forage surplus to the needs of wildlife be available for domestic livestock. The EIS recognizes habitat as the key to wildlife abundance (numbers).

3. According to CEQ Guidelines (Sec. 1502.1 Regulations for Implementing the provisions of the National Environmental Policy Act), the purpose of an EIS is to discuss the impacts on the environment of various alternatives and methods of reaching or attaining certain goals and objectives; not a discussion of the rationale supporting those goals and objectives. Such rationale comes from legislation and Service policy and is contained in program management documents on file in the FWS Lewistown office.

   The goals and objectives were developed early in the planning process and presented at the public meetings for comment and revision. The level of detail requested here is beyond that appropriate for an EIS.

4. Although most of the refuge staff have wildlife degrees rather than range, they also have almost 110 years of grassland management experience with federal land management agencies. In addition, two staff members have degrees in range management.

5. Your concern over the $1.89 on AUM is correct in that the $1.89 fee does not reflect the value of the AUM to the ranch operation. This has been corrected by adopting a linear programming (LP) approach to estimating the financial impacts to the rancher.

   The LP analysis estimates the change in gross income associated with a change in CMR AUMs. The LP measures changes in rancher cash expenditures, labor inputs, returns to investment, and beef cow inventories. The analysis does this using an average ranch budget for ranches of different ranch size classes. These budgets take into account numerous factors including seasons of use and differences in dependencies. This approach tailors the analysis to the regions and ranches by reviewing the ranch budgets with a representative rancher panel for EIS area. In this case the value per AUM was $12.87.

   This technique is being applied to analyze similar grazing actions for BLM. The National Cattlemen's Association and Public Lands Council support this approach to impact assessment. See Appendix 10 for example inputs and outputs. The subsidy results not from a flow of federal funds ($106,830 out and $15,133 back), but from a resource subsidy to ranchers who receive a AUMs worth substantially more than $1.89 to them for $1.89. It is this difference that generates the subsidy.

6. If FWS accepted a premise that livestock grazing and wildlife were incompatible, there would be no grazing on CMR. FWS believes that grazing under certain conditions, as to time, area, and intensity, is compatible with wildlife. Thus, FWS believes the issue is covered adequately in the document.

7. FWS would like to point out that range condition and wildlife habitat condition are not the same. See Foreword.

Sierra Club
Northern Great Plains Region

Bruce Hamilton
Regional Representative
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Rose McCullough
Assistant Representative
715 South 14 St.
Lincoln, Neb. 68508
(402) 435-7023

Dec. 2, 1980

Erwin W. Steucke, Area Manager
U.S. Fish and Wildlife Service
Federal Building, Room 3035
316 N. 26th St.
Billings, Mont. 59101

Dear Erwin W. Steucke,

Thank you for keeping me informed about planning for the Charles M. Russell National Wildlife Refuge. The CMR is one of the most spectacular and controversial refuges in the system. Unfortunately, political considerations, rather than ecological considerations, are all too often the basis for management. You and your staff are to be commended on the recent draft environmental impact statement because it tries to steer clear of the adverse local political climate and tries to chart a course that is right for the wildlife resources that are entrusted to you as guardian of the CMR.

Future management directions should not be bound by past mistakes. The DES outlines the problems with existing management and the consequences of no action quite clearly (pp. 62-68). If this is an accurate representation of the situation it is obviously unacceptable and reform is needed. It's amazing that stocking rates are still set on the basis of a 1952-53 range survey.

Overall, I think you have chosen a prudent course in alternative B, the proposed action. However, I should limit my endorsement by adding that there are parts of the proposed action that I disagree with or am uncertain about because too little information is provided. I should also add that the proposed action looks the best because all the other alternatives aren't really available choices or are unacceptable. A more realistic range of alternatives would have made a choice harder, but more meaningful.

As stated earlier, the no action alternative has led to a steady degradation of key parts of the CMR. (It should have been pointed out that present management has not been detrimental to most of the CMR and that the conflicts that deserve immediate attention are limited to a small, but highly critical segment of the entire refuge.) In your own words (p. 26) the no action and multiple use alternatives "do not provide a wildlife refuge situation." Also the multiple use option is not allowable under existing law. Similarly, the no grazing alternative is not possible under existing executive order. The intensive wildlife management alternative is too costly to implement and, by your own admission would "destroy the naturalness of the refuge" (p. 26)--a result that violates the stated mission of the CMR. In summary, there are no serious options to choose from. All the alternatives are straw men. I would have preferred to see a series of variations of the proposed action with different realistic mixes of livestock curtailment, range improvements, land treatment, inholding acquisition and wildlife species reintroduction. Instead, by endorsing the proposed action we end up giving you a blank check on some fairly significant decisions.

For example, obviously a change in livestock management practices is warranted and probably a significant cut in livestock use is necessary. But where did the magic number 33% 1

"Not blind opposition to progress, but opposition to blind progress."

come from? It's impossible to follow the extrapolation from the summary of Mackie's work in appendix 15 to the conclusion that a 33% cut is warranted. 1

I'm also concerned that the livestock reduction may not translate into an improved on-the-ground situation at CMR. Most of the critical conflicts occur in riparian zones that are scarce and heavily used by both livestock and wildlife. Will a 33% reduction in stocking levels reduce this conflict? Or will the remaining cattle continue to congregate in the riparian areas? 2

It seems to me that site specific grazing management programs would be useful, and would also be more in keeping with the requirements of the NRDC court case. You state (p. 10) that plans for each allotment will be prepared by 1985. Perhaps I'm just too impatient. Under each alternative I'm told how much additional fencing, ripping, water development, etc. to expect. But I'm never told where to expect it. Will you be fencing riparian zones? Will there be an attempt to develop water on dry low-slope areas to disperse livestock use? Is the ripping a one-time-only treatment to restore a trampled, eroded area or is the ripping a periodic intensive management treatment? Are you trying to build up big game herds to a point where additional livestock cuts will be necessary in the future? Does establishment of set grazing rotation systems preclude the use of prescription grazing to accomplish short-term vegetation manipulation? 3

I'd also like to comment on a few specific proposals:

Endangered species reintroduction: I'm generally very pleased with your announced program. Does availability limit the number of peregrine reintroductions to two?

Bison: Under alternative C you suggest bison reintroduction in U.L. Bend. Why wasn't bison reintroduction explored in more areas and considered part of the proposed action? 4

Bighorn sheep: I'm concerned about plans to introduce more sheep when you aren't sure why the last population crash occurred.

Predator control: On a wildlife refuge I would hope predator control is only carried out in extreme situations, such as when endangered species are threatened. Wildlife refuges are established for all native wildlife--not just game species. With this in mind I would strongly oppose proposals to control coyotes to "protect" big game species.

Farming: Most farming should be phased out. While row crops may help some exotic species like pheasants they take native habitat from native game birds. Some minimal farming around the edges of the CMR to minimize wildlife conflicts on surrounding cropland may be justified--if it can be demonstrated that this technique works. Farming in riparian zones should be phased out--especially along the Missouri River bottoms.

Ripping: I fail to see how ripping makes sense if you are trying to maintain the natural setting. One time ripping of severely abused areas may be justified. But ripping to "improve wildlife habitat and reduce soil erosion" (p. 20) at the same time you are phasing out farming seems at cross purposes. Especially in times of agency budget cutting, minimal manipulation should be the rule. 5

Pool level management: Does the FWS work with the Corps of Engineers to try to make sure the pool level of Fort Peck Reservoir is managed in a manner that does not harm fish and wildlife? Should this be part of the refuge master plan? Are there other COE plans that could conflict with FWS plans where management direction is needed? Would major industrial water marketing from Fort Peck Reservoir for coal development severely impact CMR? If so, can steps be taken to minimize the damage? 6

Roads: There is some discussion in the appendices about the adverse impact of roads on big game and other wildlife. Shouldn't a travel plan/road closure policy be part of this plan? 7

Air quality: In the "affected environment" section (pp. 31-36) there is no discussion of present air quality, future threats to that quality, and measures available to protect present quality. 8

Fires: In the DES there are general statements about how much land might be subject to prescribed burning. I would prefer to see a fire management plan where the refuge is zoned into areas where wildfires will be allowed to burn, areas where prescribed burning will be pursued, and areas where immediate fire suppression will be necessary. 9

Mineral development: The CMR has marginal deposits of oil, gas, aggregate, bentonite and coal (p. 36). Who owns the mineral? Is any of it withdrawn? How will the FWS deal with development proposals if any surface? Why wasn't this addressed in the DES? 10

Thank you for the opportunity to comment. Please send me a copy of the final EIS and any other news about the CMR.

Sincerely,

Bruce Hamilton

Bruce Hamilton
Regional representative

Response to the Sierra Club, Northern Great Plains Region

1. The amount of forage available to livestock was computed on a section-by-section basis. Since there are over 1,000 sections on CMR, a listing of the tabulation of each is beyond the scope of this document. The 32.6 percent reduction is an average of the reductions applied to these sections. See new Appendices 1b, 2, and revised Appendix 15.

2. The Proposed Action will exclude livestock from over 90 percent of the riparian habitat along the Missouri and Musselshell Rivers within the refuge. Much riparian habitat will receive little or no livestock grazing. Other riparian areas will still have light to moderate livestock use, but seasons of use will be favorable for some recovery. Livestock grazing in all habitats on the refuge will be governed by the wildlife objectives on page 5 of the text. If the proposed level and type of grazing do not allow these objectives to be achieved, grazing will be modified.

3. See response #2 above. Also, the exact locations of some of the developments are beyond the scope of the EIS. After reevaluation of data and comments, ripping has been deleted from the Proposed Action and the text revised. Development of additional water on the refuge would be detrimental to most wildlife in that it would distribute livestock into areas now used almost exclusively and needed by wildlife. It is not the intent of the FWS to increase big game populations beyond the levels proposed in the wildlife objectives. The FWS believes the level of grazing set forth in the Proposed Action is compatible with these objectives. While rest rotation grazing systems would not preclude the use of prescription grazing for short-term habitat manipulation, it reduces the viability of such an option.

4. In the planning process, a detailed discussion was held concerning this subject. The decision was made not to reintroduce bison onto CMR (including UL Bend) because of increased fencing costs, surplus animal disposal problems, and impacts on refuge activities. The FWS will, however, work with any permittee desiring to replace cattle with bison.

5. See response #3 above.

6. A Memorandum of Agreement (Appendix 3) between the COE and FWS recognizes the primary use of CMR as a wildlife area and provides a vehicle for ensuring that the mandates of both agencies are met. The FWS, Montana Department of Fish, Wildlife, and Parks, and COE will work together to ensure the best possible fishery management within the constraints of primary mandates of the COE. Industrial water marketing is speculative at this time and beyond the scope of the EIS.

7. Several hundred miles of designated roads exist on the refuge. Those suitable for continued use will remain open, while those susceptible to landslides, washouts, and wildlife conflicts may be abandoned or changed. The travel map is beyond the scope of the EIS but is available at Lewistown, Sippery Ann, Jordan, and Fort Peck headquarters.

8. The "Affected Environment" section deals only with those resources which may be impacted or may impact the alternatives. In general, air quality is not one of those at CMR.

9. A refuge-wide fire management plan will be developed before wild-fire and/or prescribed fire is integrated into habitat management on CMR. Your suggestions have merit and will receive considera-tion.

10. Ownership of mineral rights on CMR is fragmented between the COE, FWS, State of Montana, and private individuals. Some COE lands are withdrawn from mineral entry at this time. Development proposals on FWS lands will be considered by the Secreatry of the Interior and a determination made in accordance with refuge objectives and energy policies at that time. Executive Order 7509 addresses mineral exploitation; please see Appendix 4, page 159.

1100 Missoula Avenue
Helena, MT 59601
November 22, 1980

Wally Steucke, Area Manager
U. S. Fish and Wildlife Service
Federal Building, Room 3035
316 N. 26th St.
Billings, MT 59101

cc: CMR

Dear Sir:

This comment responds to the draft environmental impact statement for the Russell Wildlife Refuge. Our interest is that the refuge be managed for the benefit of wildlife--that any livestock use reinforce this objective. This management should be accomplished by use of natural methods to the fullest extent possible.

The Russell Refuge can demonstrate the value of wildlife refuges for other purposes, such as benefits from healthy watersheds and for public enjoyment. Control of livestock trespass is essential for this program. Roads should be kept to a minimum.

We question the validity of three of the options: "A - no action" is not a benefit to wildlife habitat; "D - multiple-use" increases livestock use and develops ponds and fences to pull livestock into unused areas--probably now of primary value to wildlife. (The term "multiple-use" could easily encompass the other options in vary-ing degree); "E - no livestock" is not a viable option since it is not politically or socially acceptable. "A" and "D" circumvent the various legal requirements to make the refuge of primary benefit to wildlife.

The EIS cites many instances where cattle grazing and wildlife are in conflict, but is only general on the location and degree. It also notes that cattle can be grazed to provide some beneficial results for antelope and deer habitat. There is considera-ble literature backing up the conflicts, but the beneficial results of overgrazing are probably outweighed by soil erosion and detriment to most wildlife habitat.

The EIS seldom gets into specifics. Unless this is done, intelligent comment is difficult. Examples of where the EIS should provide more information follow:

1. Acres and location of conflict between livestock grazing and ground nesting birds such as sharptail grouse.
2. Acres and location of conflict between cattle, deer and elk, particularly on big game winter range. 1
3. Condition, location and acres of primary cattle range, particularly areas in fair and poor condition.
4. Soil losses in tons/A attributable to overuse. 2
5. Production of forage for cattle on primary ranges on lbs./A basis. 3

Examples of the difficulty of piecing together scattered bits of information follow:

From your description of the range conditions it appears that most of the livestock use falls in the "fair" classification of 7% of the area, or on about 58,000 acres. AUMs of use on the Russell is given as 56,524 AUMs. Since a very large share of cattle use is on the fair condition range, the use approaches 1 AUM/acre. Unfortun-ately, no production or acreage figures are given for the primary range areas. On page 175 the average production/acre on given excellent ranges averages about

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Wally Steucke — Page 2 — November 22, 1980

1200 lbs./acre. On fair range, production would be no more than half or 600 lbs./acre. If 30 to 40% in proper use, then it takes not one acre but three to four acres per AUM. These figures are only applicable as averages because of the lack of informa-tion. They could indicate that your proposed reduction of use may be optimistic.

Where use is heavy, cattle tend to browse more. This brings their use into conflicts with sharptail grouse and pheasants which use buffalo berry, chokecherry, and other brush for food and cover. Heavy use also reduces available browse for elk and deer in the winter.

You do not indicate how you plan to handle the reductions. Reducing numbers, parti-cularly on season[illegible] ranges, will pull cattle off the steeper slopes and areas further from water but otherwise does not do much to lower concentrations nearer water. 4

Reducing spring use (which may be planned but not shown) will provide much greater benefits than reductions in numbers of cattle.

We generally support the CMR goals, wildlife and range objectives on pages 4, 5, and 6. We applaud your proposal to introduce peregrine falcons, black footed ferrets, and the Rocky Mountain bighorn.

In conclusion, we wish to emphasize that these public lands have been set aside for the benefit of wildlife. The goals of improving wildlife habitat on these rough lands are in harmony with protecting the land and water for the longrange public interest.

However, we do not oppose reasonable grazing by livestock where this meets the primary wildlife objectives.

At this time the F and W "Proposed Option B" substantially improves the position of wildlife on the refuge, with some allowance for livestock use. We support the F and W proposal "B."

Sincerely,

Noel Rosetta

Noel Rosetta, Resource Consultant
Upper Missouri Group Sierra Club

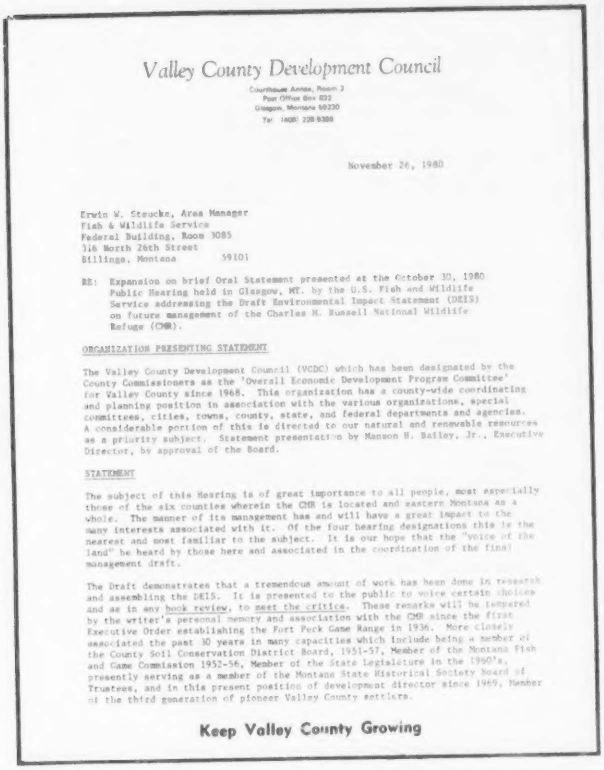
Response to the Sierra Club, Upper Missouri Region

1. The information requested is beyond the scope of this document. Much of the information is contained in refuge files which are available for your examination at the refuge headquarters in Lewistown, Montana.

2. According to the Montana State Office of the Soil Conservation Service, no monitoring programs of this type have occurred on CMR, and thus, this type of data is unavailable.

3. See response #1 above.

4. AUM reductions are on an allotment-by-allotment basis, depending on the needs of wildlife in each allotment. In general, going to light grazing, as provided for in the Proposed Action, will result in light to moderate grazing in level areas near water. In steep terrain and away from water, there will be little, if any, live-stock grazing. Also, in general, turn-on dates for livestock will be later in the spring than at present. Livestock grazing in all habitats on the refuge will be governed by wildlife objectives; if the proposed level and type of grazing do not allow these objectives to be achieved, grazing will be modified.



Valley County Development Council
Courthouse Annex, Room 3
Post Office Box 832
Glasgow, Montana 59230
Tel. (406) 228-9380

November 26, 1980

Erwin W. Steucke, Area Manager
Fish & Wildlife Service
Federal Building, Room 3085
316 North 26th Street
Billings, Montana 59101

RE: Expansion on brief Oral Statement presented at the October 30, 1980 Public Hearing held in Glasgow, MT. by the U.S. Fish and Wildlife Service addressing the Draft Environmental Impact Statement (DEIS) on future management of the Charles M. Russell National Wildlife Refuge (CMR).

ORGANIZATION PRESENTING STATEMENT

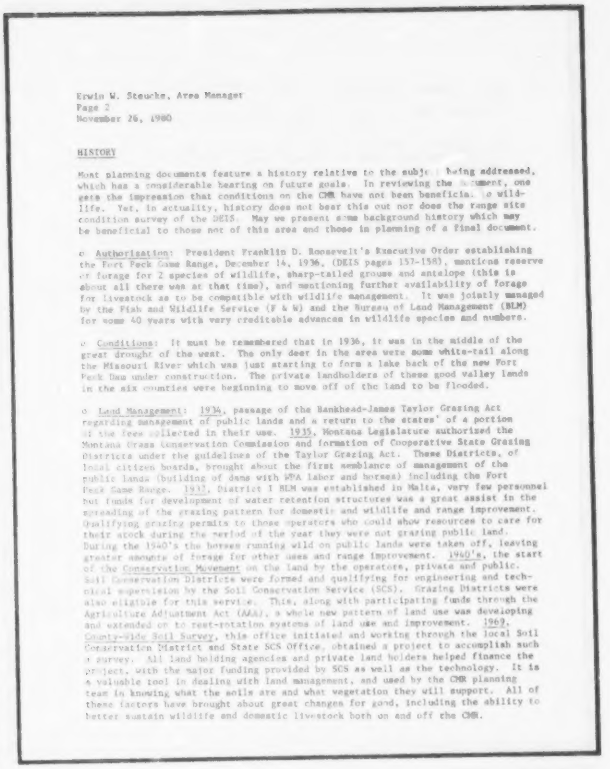
The Valley County Development Council (VCDC) which has been designated by the County Commissioners as the 'Overall Economic Development Program Committee' for Valley County since 1968. This organization has a county-wide coordinating and planning position in association with the various organizations, special committees, cities, towns, county, state, and federal departments and agencies. A considerable portion of this is directed to our natural and renewable resources as a priority subject. Statement presentation by Manson H. Bailey, Jr., Executive Director, by approval of the Board.

STATEMENT

The subject of this Hearing is of great importance to all people, most especially those of the six counties wherein the CMR is located and eastern Montana as a whole. The manner of its management has and will have a great impact to the many interests associated with it. Of the four hearing designations this is the nearest and most familiar to the subject. It is our hope that the "voice of the land" be heard by those here and associated in the coordination of the final management draft.

The Draft demonstrates that a tremendous amount of work has been done in research and assembling the DEIS. It is presented to the public to voice certain choices and as in any book review, to meet the critics. These remarks will be tempered by the writer's personal memory and association with the CMR since the first Executive Order establishing the Fort Peck Game Range in 1936. More closely associated the past 30 years in many capacities which include being a member of the County Soil Conservation District Board, 1951-57, Member of the Montana Fish and Game Commission 1952-56, Member of the State Legislature in the 1960's, presently serving as a member of the Montana State Historical Society Board of Trustees, and in this present position of development director since 1969. Member of the third generation of pioneer Valley County settlers.

Keep Valley County Growing



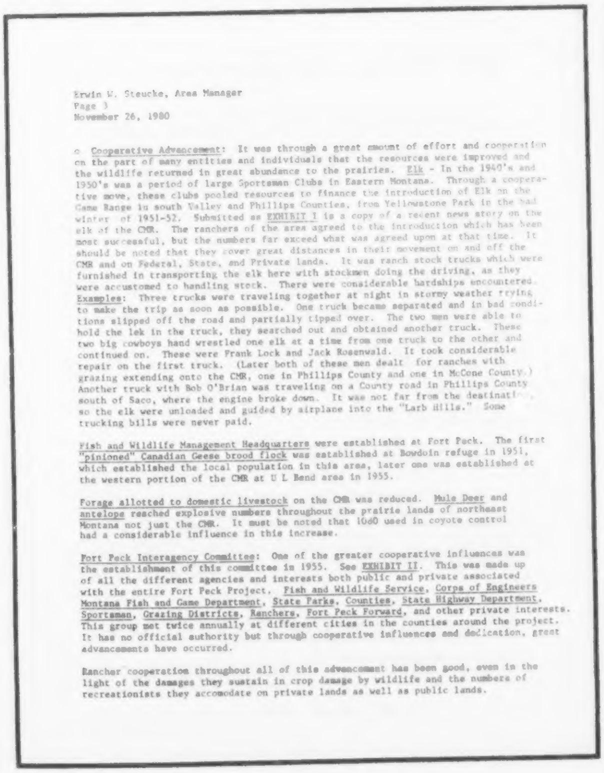
HISTORY

Most planning documents feature a history relative to the subject being addressed, which has a considerable bearing on future goals. In reviewing the document, one gets the impression that conditions on the CMR have not been beneficial to wildlife. Yet, in actuality, history does not bear this out nor does the range site condition survey of the DEIS. May we present some background history which may be beneficial to those not of this area and those in planning of a final document.

o Authorization: President Franklin D. Roosevelt's Executive Order establishing the Fort Peck Game Range, December 14, 1936, (DEIS pages 157-158), mentions reserve of forage for 2 species of wildlife, sharp-tailed grouse and antelope (this is about all there was at that time), and mentioning further availability of forage for livestock as to be compatible with wildlife management. It was jointly managed by the Fish and Wildlife Service (F & W) and the Bureau of Land Management (BLM) for some 40 years with very creditable advances in wildlife species and numbers.

o Conditions: It must be remembered that in 1936, it was in the middle of the great drought of the west. The only deer in the area were some white-tail along the Missouri River which was just starting to form a lake back of the new Fort Peck Dam under construction. The private landholders of these good valley lands in the six counties were beginning to move off of the land to be flooded.

o Land Management: 1934, passage of the Bankhead-James Taylor Grazing Act regarding management of public lands and a return to the states' of a portion of the fees collected in their use. 1935, Montana Legislature authorized the Montana Grass Conservation Commission and formation of Cooperative State Grazing Districts under the guidelines of the Taylor Grazing Act. These Districts, of local citizen boards, brought about the first semblance of management of the public lands (building of dams with WPA labor and horses) including the Fort Peck Game Range. 1932, District I BLM was established in Malta, very few personnel but funds for development of water retention structures was a great assist in the spreading of the grazing pattern for domestic and wildlife and range improvement. Qualifying grazing permits to those operators who could show resources to care for their stock during the period of the year they were not grazing public land. During the 1940's the horses running wild on public lands were taken off, leaving greater amounts of forage for other uses and range improvement. 1940's, the start of the Conservation Movement on the land by the operators, private and public. Soil Conservation Districts were formed and qualifying for engineering and technical supervision by the Soil Conservation Service (SCS). Grazing Districts were also eligible for this service. This, along with participating funds through the Agriculture Adjustment Act (AAA), a whole new pattern of land use was developing and extended on to rest-rotation systems of land use and improvement. 1969, County-Wide Soil Survey, this office initiated and working through the local Soil Conservation District and State SCS Office, obtained a project to accomplish such a survey. All land holding agencies and private land holders helped finance the project, with the major funding provided by SCS as well as the technology. It is a valuable tool in dealing with land management, and used by the CMR planning team in knowing what the soils are and what vegetation they will support. All of these factors have brought about great changes for good, including the ability to better sustain wildlife and domestic livestock both on and off the CMR.



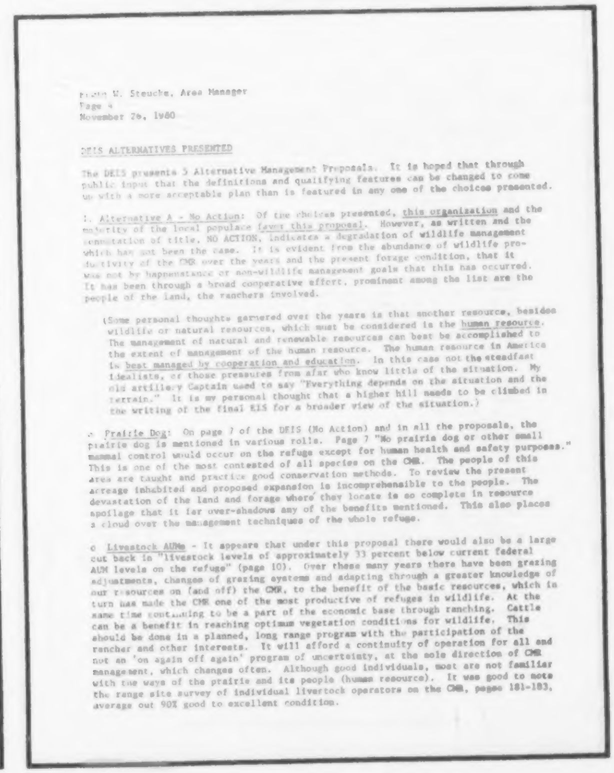
o Cooperative Advancement: It was through a great amount of effort and cooperation on the part of many entities and individuals that the resources were improved and the wildlife returned in great abundance to the prairies. Elk - In the 1940's and 1950's was a period of large Sportsman Clubs in Eastern Montana. Through a cooperative move, these clubs pooled resources to finance the introduction of Elk on the Game Range in south Valley and Phillips Counties, from Yellowstone Park in the bad winter of 1951-52. Submitted as EXHIBIT I is a copy of a recent news story on the elk of the CMR. The ranchers of the area agreed to the introduction which has been most successful, but the numbers far exceed what was agreed upon at that time. It should be noted that they cover great distances in their movement on and off the CMR and on Federal, State, and Private lands. It was ranch stock trucks which were furnished in transporting the elk here with stockmen doing the driving, as they were accustomed to handling stock. There were considerable hardships encountered. Examples: Three trucks were traveling together at night in stormy weather trying to make the trip as soon as possible. One truck became separated and in bad conditions slipped off the road and partially tipped over. The two men were able to hold the lek in the truck, they searched out and obtained another truck. These two big cowboys hand wrestled one elk at a time from one truck to the other and continued on. These were Frank Lock and Jack Rosenwald. It took considerable repair on the first truck. (Later both of these men dealt for ranches with grazing extending onto the CMR, one in Phillips County and one in McCone County.) Another truck with Bob O'Brian was traveling on a County road in Phillips County south of Saco, where the engine broke down. It was not far from the destination, so the elk were unloaded and guided by airplane into the "Larb Hills." Some trucking bills were never paid.

Fish and Wildlife Management Headquarters were established at Fort Peck. The first "pinioned" Canadian Geese brood flock was established at Bowdoin refuge in 1951, which established the local population in this area, later one was established at the western portion of the CMR at U L Bend area in 1955.

Forage allotted to domestic livestock on the CMR was reduced. Mule Deer and antelope reached explosive numbers throughout the prairie lands of northeast Montana not just the CMR. It must be noted that 1080 used in coyote control had a considerable influence in this increase.

Fort Peck Interagency Committee: One of the greater cooperative influences was the establishment of this committee in 1955. See EXHIBIT II. This was made up of all the different agencies and interests both public and private associated with the entire Fort Peck Project. Fish and Wildlife Service, Corps of Engineers Montana Fish and Game Department, State Parks, Counties, State Highway Department, Sportsman, Grazing Districts, Ranchers, Fort Peck Forward, and other private interests. This group met twice annually at different cities in the counties around the project. It has no official authority but through cooperative influences and dedication, great advancements have occurred.

Rancher cooperation throughout all of this advancement has been good, even in the light of the damages they sustain in crop damage by wildlife and the numbers of recreationists they accomodate on private lands as well as public lands.



DEIS ALTERNATIVES PRESENTED

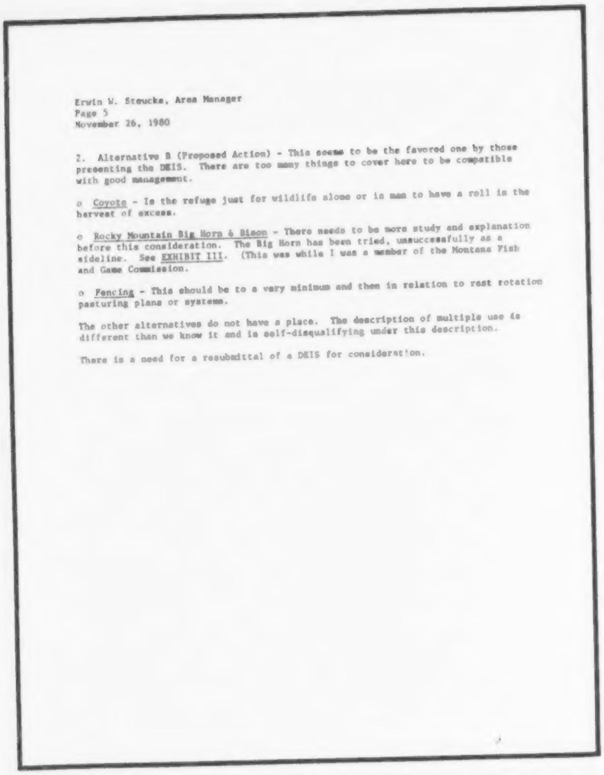
The DEIS presents 5 Alternative Management Proposals. It is hoped that through public input that the definitions and qualifying features can be changed to come up with a more acceptable plan than is featured in any one of the choices presented.

1. Alternative A - No Action: Of the choices presented, this organization and the majority of the local populace favor this proposal. However, as written and the connotation of title, NO ACTION, indicates a degradation of wildlife management which has not been the case. It is evident from the abundance of wildlife productivity of the CMR over the years and the present forage condition, that it was not by happenstance or non-wildlife management goals that this has occurred. It has been through a broad cooperative effort, prominent among the list are the people of the land, the ranchers involved.

> (Some personal thoughts garnered over the years is that another resource, besides wildlife or natural resources, which must be considered is the human resource. The management of natural and renewable resources can best be accomplished to the extent of management of the human resource. The human resource in America is best managed by cooperation and education. In this case not the steadfast idealists, or those pressures from afar who know little of the situation. My old artillery Captain used to say "Everything depends on the situation and the terrain." It is my personal thought that a higher hill needs to be climbed in the writing of the final EIS for a broader view of the situation.)

o Prairie Dog: On page 7 of the DEIS (No Action) and in all the proposals, the prairie dog is mentioned in various rolls. Page 7 "No prairie dog or other small mammal control would occur on the refuge except for human health and safety purposes." This is one of the most contested of all species on the CMR. The people of this area are taught and practice good conservation methods. To review the present acreage inhabited and proposed expansion is incomprehensible to the people. The devastation of the land and forage where they locate is so complete in resource spoilage that it far over-shadows any of the benefits mentioned. This also places a cloud over the management techniques of the whole refuge.

o Livestock AUMs - It appears that under this proposal there would also be a large cut back in "livestock levels of approximately 33 percent below current federal AUM levels on the refuge" (page 10). Over these many years there have been grazing adjustments, changes of grazing systems and adapting through a greater knowledge of our resources on (and off) the CMR, to the benefit of the basic resources, which in turn has made the CMR one of the most productive of refuges in wildlife. At the same time continuing to be a part of the economic base through ranching. Cattle can be a benefit in reaching optimum vegetation conditions for wildlife. This should be done in a planned, long range program with the participation of the rancher and other interests. It will afford a continuity of operation for all and not an 'on again off again' program of uncertainty, at the sole direction of CMR management, which changes often. Although good individuals, most are not familiar with the ways of the prairie and its people (human resource). It was good to note the range site survey of individual livertock operators on the CMR, pages 181-183, average out 90% good to excellent condition.



Erwin W. Steucke, Area Manager
Page 5
November 26, 1980

2. Alternative B (Proposed Action) - This seems to be the favored one by those presenting the DEIS. There are too many things to cover here to be compatible with good management.

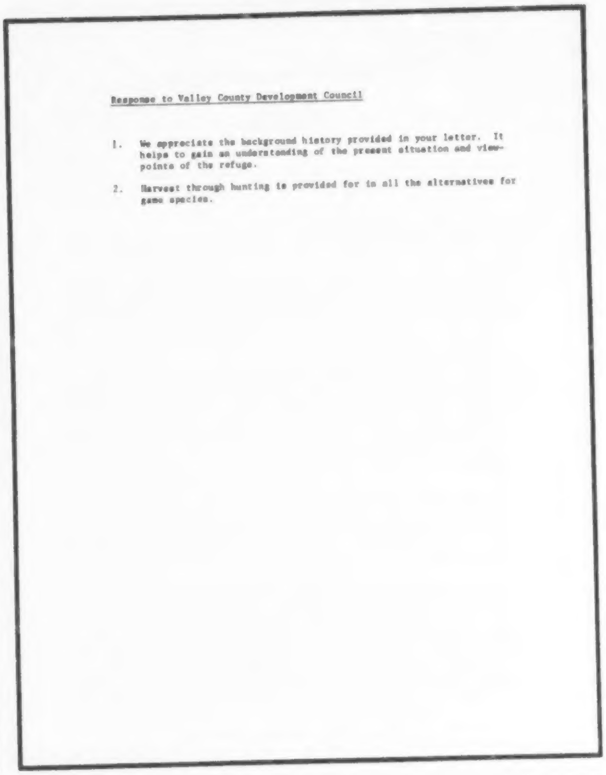
o Coyote - Is the refuge just for wildlife alone or is man to have a roll in the harvest of excess.

o Rocky Mountain Big Horn & Bison - There needs to be more study and explanation before this consideration. The Big Horn has been tried, unsuccessfully as a sideline. See EXHIBIT III. (This was while I was a member of the Montana Fish and Game Commission.

o Fencing - This should be to a very minimum and then in relation to rest rotation pasturing plans or systems.

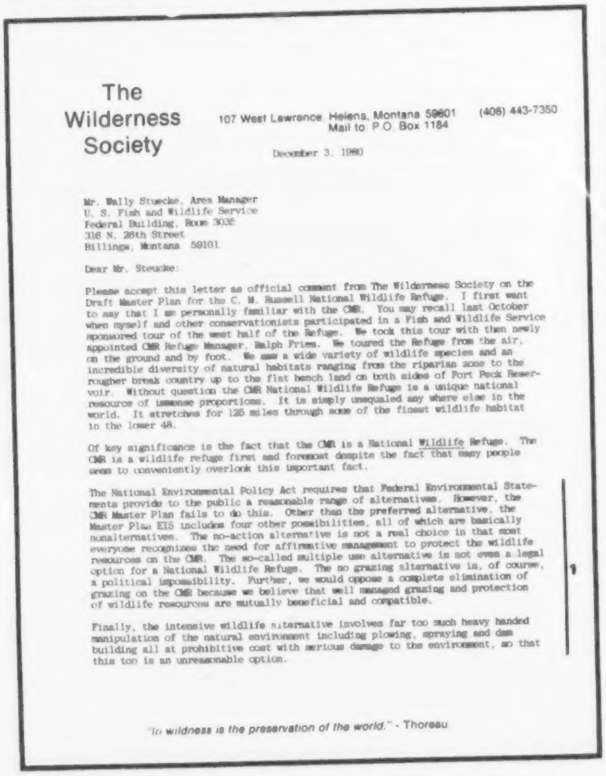
The other alternatives do not have a place. The description of multiple use is different than we know it and is self-disqualifying under this description.

There is a need for a resubmittal of a DEIS for consideration.



Response to Valley County Development Council

1. We appreciate the background history provided in your letter. It helps to gain an understanding of the present situation and viewpoints of the refuge.
2. Harvest through hunting is provided for in all the alternatives for game species.



The
Wilderness
Society

107 West Lawrence, Helena, Montana 59601
Mail to: P.O. Box 1184
(406) 443-7350

December 3, 1980

Mr. Wally Stuecke, Area Manager
U. S. Fish and Wildlife Service
Federal Building, Room 3032
316 N. 26th Street
Billings, Montana 59101

Dear Mr. Steucke:

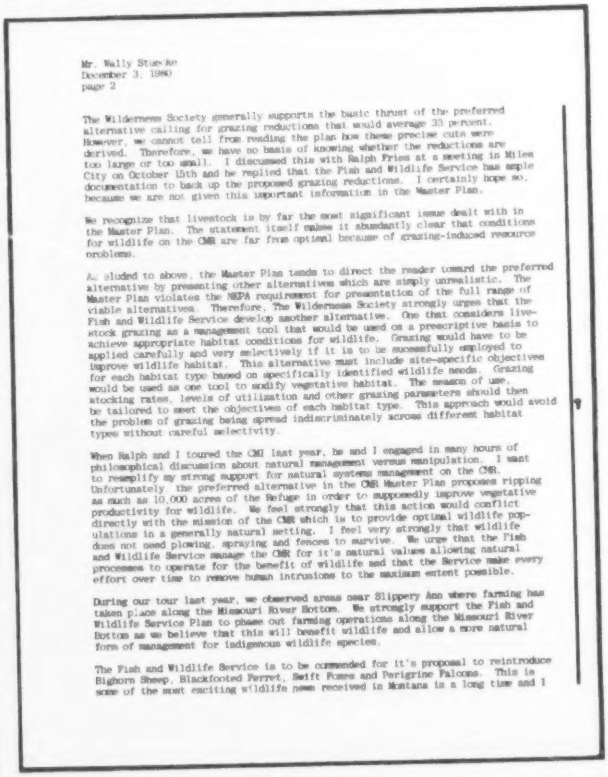
Please accept this letter as official comment from The Wilderness Society on the Draft Master Plan for the C. M. Russell National Wildlife Refuge. I first want to say that I am personally familiar with the CMR. You may recall last October when myself and other conservationists participated in a Fish and Wildlife Service sponsored tour of the west half of the Refuge. We took this tour with then newly appointed CMR Refuge Manager, Ralph Fries. We toured the Refuge from the air, on the ground and by foot. We saw a wide variety of wildlife species and an incredible diversity of natural habitats ranging from the riparian zone to the rougher break country up to the flat bench land on both sides of Fort Peck Reservoir. Without question the CMR National Wildlife Refuge is a unique national resource of immense proportions. It is simply unequaled any where else in the world. It stretches for 125 miles through some of the finest wildlife habitat in the lower 48.

Of key significance is the fact that the CMR is a National Wildlife Refuge. The CMR is a wildlife refuge first and foremost despite the fact that many people seem to conveniently overlook this important fact.

The National Environmental Policy Act requires that Federal Environmental Statements provide to the public a reasonable range of alternatives. However, the CMR Master Plan fails to do this. Other than the preferred alternative, the Master Plan EIS includes four other possibilities, all of which are basically nonalternatives. The no-action alternative is not a real choice in that most everyone recognizes the need for affirmative management to protect the wildlife resources on the CMR. The so-called multiple use alternative is not even a legal option for a National Wildlife Refuge. The no grazing alternative is, of course, a political impossibility. Further, we would oppose a complete elimination of grazing on the CMR because we believe that well managed grazing and protection of wildlife resources are mutually beneficial and compatible. 1

Finally, the intensive wildlife alternative involves far too much heavy handed manipulation of the natural environment including plowing, spraying and dam building all at prohibitive cost with serious damage to the environment, so that this too is an unreasonable option.

"In wildness is the preservation of the world." - Thoreau



Mr. Wally Stuecke
December 3, 1980
page 2

The Wilderness Society generally supports the basic thrust of the preferred alternative calling for grazing reductions that would average 33 percent. However, we cannot tell from reading the plan how these precise cuts were derived. Therefore, we have no basis of knowing whether the reductions are too large or too small. I discussed this with Ralph Fries at a meeting in Miles City on October 15th and he replied that the Fish and Wildlife Service has ample documentation to back up the proposed grazing reductions. I certainly hope so, because we are not given this important information in the Master Plan.

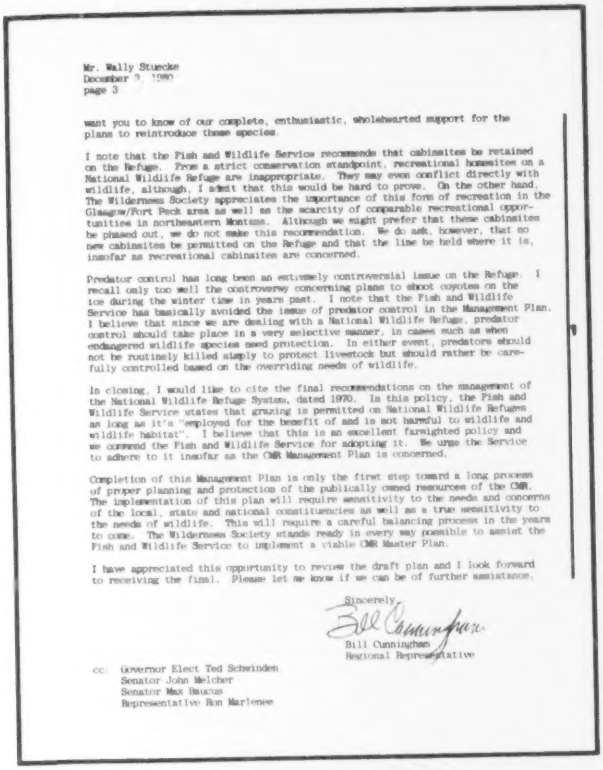
We recognize that livestock is by far the most significant issue dealt with in the Master Plan. The statement itself makes it abundantly clear that conditions for wildlife on the CMR are far from optimal because of grazing-induced resource problems.

As eluded to above, the Master Plan tends to direct the reader toward the preferred alternative by presenting other alternatives which are simply unrealistic. The Master Plan violates the NEPA requirement for presentation of the full range of viable alternatives. Therefore, The Wilderness Society strongly urges that the Fish and Wildlife Service develop another alternative. One that considers livestock grazing as a management tool that would be used on a prescriptive basis to achieve appropriate habitat conditions for wildlife. Grazing would have to be applied carefully and very selectively if it is to be successfully employed to improve wildlife habitat. This alternative must include site-specific objectives for each habitat type based on specifically identified wildlife needs. Grazing would be used as one tool to modify vegetative habitat. The season of use, stocking rates, levels of utilization and other grazing parameters should then be tailored to meet the objectives of each habitat type. This approach would avoid the problem of grazing being spread indiscriminately across different habitat types without careful selectivity. 1

When Ralph and I toured the CMI last year, he and I engaged in many hours of philosophical discussion about natural management versus manipulation. I want to reamplify my strong support for natural systems management on the CMR. Unfortunately, the preferred alternative in the CMR Master Plan proposes ripping as much as 10,000 acres of the Refuge in order to supposedly improve vegetative productivity for wildlife. We feel strongly that this action would conflict directly with the mission of the CMR which is to provide optimal wildlife populations in a generally natural setting. I feel very strongly that wildlife does not need plowing, spraying and fences to survive. We urge that the Fish and Wildlife Service manage the CMR for it's natural values allowing natural processes to operate for the benefit of wildlife and that the Service make every effort over time to remove human intrusions to the maximum extent possible.

During our tour last year, we observed areas near Slippery Ann where farming has taken place along the Missouri River Bottom. We strongly support the Fish and Wildlife Service Plan to phase out farming operations along the Missouri River Bottom as we believe that this will benefit wildlife and allow a more natural form of management for indigenous wildlife species.

The Fish and Wildlife Service is to be commended for it's proposal to reintroduce Bighorn Sheep, Blackfooted Ferret, Swift Foxes and Perigrine Falcons. This is some of the most exciting wildlife news received in Montana in a long time and I



Mr. Wally Stuecke
December 3, 1980
page 3

want you to know of our complete, enthusiastic, wholehearted support for the plans to reintroduce these species.

I note that the Fish and Wildlife Service recommends that cabinsites be retained on the Refuge. From a strict conservation standpoint, recreational homesites on a National Wildlife Refuge are inappropriate. They may even conflict directly with wildlife, although, I admit that this would be hard to prove. On the other hand, The Wilderness Society appreciates the importance of this form of recreation in the Glasgow/Fort Peck area as well as the scarcity of comparable recreational opportunities in northeastern Montana. Although we might prefer that these cabinsites be phased out, we do not make this recommendation. We do ask, however, that no new cabinsites be permitted on the Refuge and that the line be held where it is, insofar as recreational cabinsites are concerned.

Predator control has long been an extremely controversial issue on the Refuge. I recall only too well the controversy concerning plans to shoot coyotes on the ice during the winter time in years past. I note that the Fish and Wildlife Service has basically avoided the issue of predator control in the Management Plan. I believe that since we are dealing with a National Wildlife Refuge, predator control should take place in a very selective manner, in cases such as when endangered wildlife species need protection. In either event, predators should not be routinely killed simply to protect livestock but should rather be carefully controlled based on the overriding needs of wildlife. 1

In closing, I would like to cite the final recommendations on the management of the National Wildlife Refuge System, dated 1970. In this policy, the Fish and Wildlife Service states that grazing is permitted on National Wildlife Refuges as long as it's "employed for the benefit of and is not harmful to wildlife and wildlife habitat". I believe that this is an excellent farsighted policy and we commend the Fish and Wildlife Service for adopting it. We urge the Service to adhere to it insofar as the CMR Management Plan is concerned.

Completion of this Management Plan is only the first step toward a long process of proper planning and protection of the publically owned resources of the CMR. The implementation of this plan will require sensitivity to the needs and concerns of the local, state and national constituencies as well as a true sensitivity to the needs of wildlife. This will require a careful balancing process in the years to come. The Wilderness Society stands ready in every way possible to assist the Fish and Wildlife Service to implement a viable CMR Master Plan.

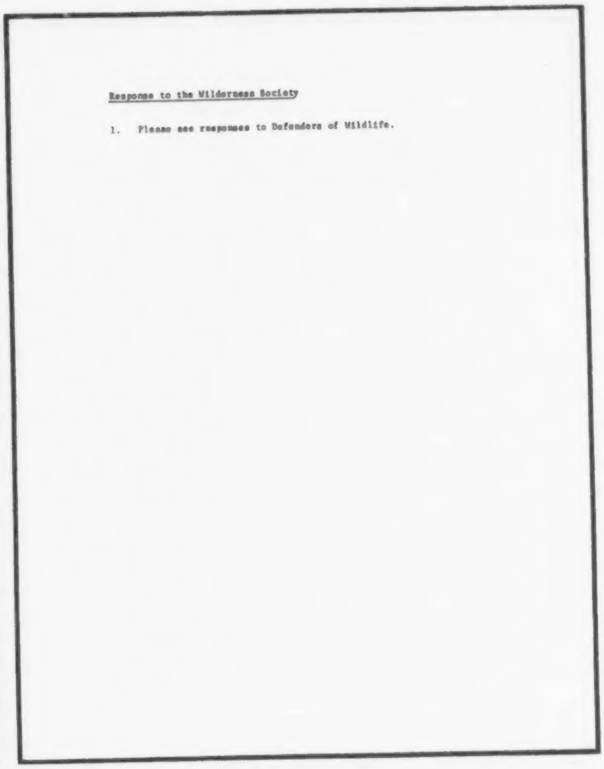
I have appreciated this opportunity to review the draft plan and I look forward to receiving the final. Please let me know if we can be of further assistance.

Sincerely,

Bill Cunningham

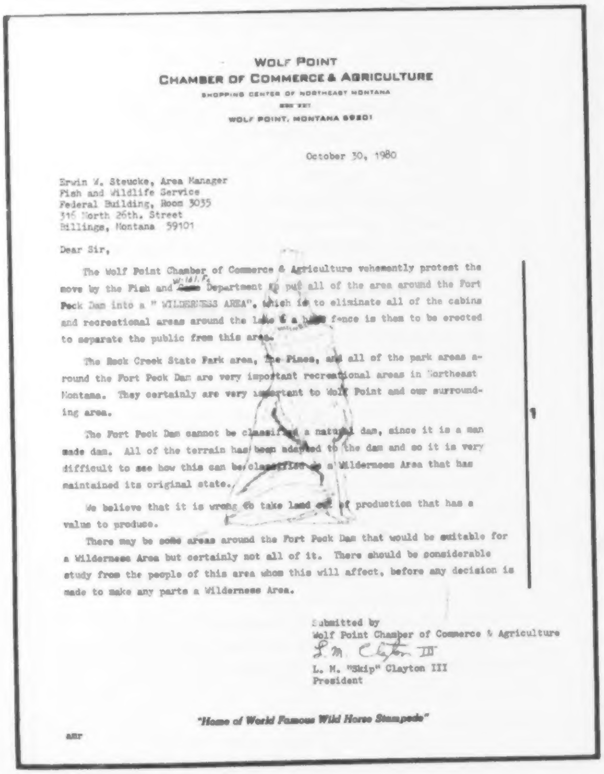
Bill Cunningham
Regional Representative

cc: Governor Elect Ted Schwinden
Senator John Melcher
Senator Max Baucus
Representative Ron Marlenee



Response to the Wilderness Society

1. Please see responses to Defenders of Wildlife.



WOLF POINT
CHAMBER OF COMMERCE & AGRICULTURE
SHOPPING CENTER OF NORTHEAST MONTANA
[illegible]
WOLF POINT, MONTANA 59201

October 30, 1980

Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3035
316 North 26th. Street
Billings, Montana 59101

Dear Sir,

The Wolf Point Chamber of Commerce & Agriculture vehemently protest the move by the Fish and ~~Game~~ Wildlife Department to put all of the area around the Fort Peck Dam into a " WILDERNESS AREA", which is to eliminate all of the cabins and recreational areas around the lake & a high fence is them to be erected to separate the public from this area.

The Rock Creek State Park area, The Pines, and all of the park areas around the Fort Peck Dam are very important recreational areas in Northeast Montana. They certainly are very important to Wolf Point and our surrounding area. 1

The Fort Peck Dam cannot be classified a natural dam, since it is a man made dam. All of the terrain has been adapted to the dam and so it is very difficult to see how this can be classified as a Wilderness Area that has maintained its original state.

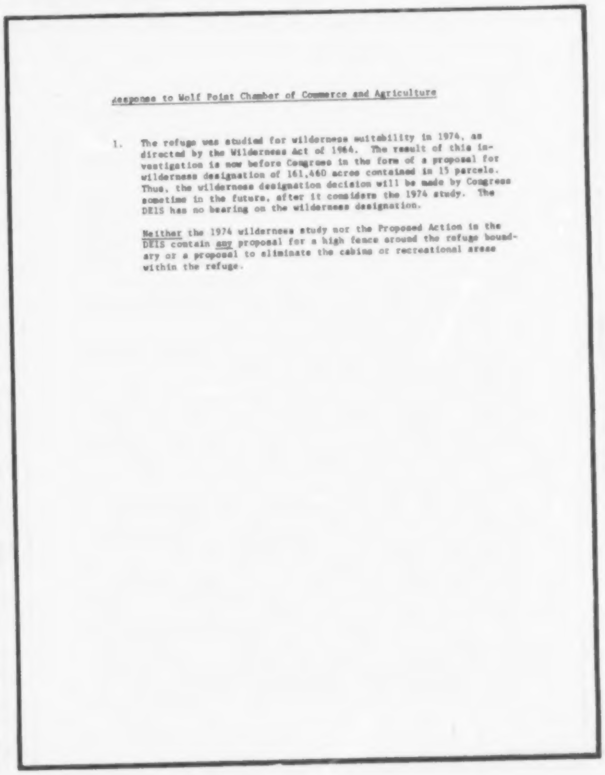
We believe that it is wrong to take land out of production that has a value to produce.

There may be some areas around the Fort Peck Dam that would be suitable for a Wilderness Area but certainly not all of it. There should be considerable study from the people of this area whom this will affect, before any decision is made to make any parts a Wilderness Area.

Submitted by
Wolf Point Chamber of Commerce & Agriculture
L. M. Clayton III
L. M. "Skip" Clayton III
President

"Home of World Famous Wild Horse Stampede"

amr



Response to Wolf Point Chamber of Commerce and Agriculture

1. The refuge was studied for wilderness suitability in 1974, as directed by the Wilderness Act of 1964. The result of this investigation is now before Congress in the form of a proposal for wilderness designation of 161,460 acres contained in 15 parcels. Thus, the wilderness designation decision will be made by Congress sometime in the future, after it considers the 1974 study. The DEIS has no bearing on the wilderness designation.

   Neither the 1974 wilderness study nor the Proposed Action in the DEIS contain any proposal for a high fence around the refuge boundary or a proposal to eliminate the cabins or recreational areas within the refuge.

COMMENTS ON THE MANAGEMENT OF
CHARLES M. RUSSELL NATIONAL WILDLIFE REFUGE
DRAFT ENVIRONMENTAL IMPACT STATEMENT

by George R. Chaffee, Resource Consultant
PO Box 361, [illegible] MT 59634

The following comments are submitted in response to certain aspects of the CMR-EIS as they pertain to alternative actions. After reviewing each of the proposed actions and in view of the CMR goals and objectives, it seems apparent this document is ambiguous relative to tangible approches in achieving wildlife betterment by natural management and manipulation of vegetation within the various ecosystems in the CMR Refuge.

This evaluation of the EIS is addressed primarily to the following components mentioned in the EIS draft report. These include the following:

Range Objectives,
Habitat Management,
Endangered or Unique Species Introduction,
Forage Allocation, and
Natural Management vs. Manipulation.

Range Objectives

The 1979 contract range survey clearly illustrates that a vast majority (92%) of the rangeland in the CMR is in Good to Excellent condition. It is well documented that wildlife forage and habitat benefit from good to excellent range condition that was achieved by management (proper use, deferred rotation and/or rest-rotation). Areas in less than satisfactory condition need to be under prescribed treatment based on the physiological requirements of the key forage plants (herbaceous and browse). 1

Under Alternative B (Proposed Action) the proposal to reduce grazing 35% by 1985 and then implement by seasonal or continuous grazing at light stocking levels is counter productive in achieving habitat improvement and forage production. The intensity of use on unsatisfactory ranges would only differ by degree under continous or light use. Intensive grazing systems, such as rest or deferred rotation grazing, could achieve the goal of habitat improvement and increased forage production. Mapping of unsuitable range sites with severe soil hazards and limitations and certain sensitive river bottom sites (river wash and beach sands) is a means of adjusting AUMs to wildlife and domestic livestock.

With a majority of the CMR refuge in good to excellent condition, the FWS is in an ideal position to achieve habitat improvement and forage production increases in a reasonable time frame by intensive grazing system implementation. 2

The proposed action (Alternative B) is predicated upon initial livestock reduction and habitat improvement through cultural practices (i.e., burning, ripping, planting, etc.). This proposal is ecologically unsound without first monitoring an allotment area for several years under a prescribed grazing system in order to more accurately determine the suitable cultural tool (burn, spray, or reseed) to achieve the wildlife habitat goal.

Light stocking and/or continous grazing as a prescription for range and habitat improvement is not the answer. Primary use (or key areas) will still endure overuse under this proposal.

Later season or winter grazing use can achieve improvement, but may not encourage the succession of the desired browse species. Livestock grazing under management with adherence to the physiological requirements of the key plant species (plant growth and regrowth) should be the vehicle upon which to achieve improved habitat condition and forage production. 2

Habitat Management

This aspect of achieving habitat improvement and increased forage production goals has merit, if intensive grazing systems are implemented with the required pasture fencing, water development, and a limited amount of prescribed burning and some ripping. Extensive boundary fencing would serve no useful purpose in achieving habitat betterment unless management boundaries of range site and condition serve as the fence lines. Moreover, ecosystem boundaries (refuge and outside areas) would be severed by boundary fencing resulting in overconcentrations of wildlife and livestock use on fence lines, coulee bottoms or riparian areas.

Ripping and planting are recognized as good management tools on limited areas and with fenced protection. River bottom areas and abandoned cultivated lands would benefit from these practices rather than to extensively rip and plant upland areas where grazing management can achieve the same goal at less risk to erosion and more economically obtainable. In planting, monoculture would displace native vegetative diversity which is essential for higher biotic potential. The success of planting deciduous shrubs in the severe climatic conditions of CMR is not documented as high.

Overall, a cooperative approach to habitat management is imperative between the FWS, BLM, MDFWP, and state and private lands. Except for certain river and reservoir bottom lands, a majority of the ecosystems within CMR are portions of ecosystems extending to adjacent ownerships. When Fort Peck Reservoir was flooded in the 1940s the major river ecosystem was destroyed, which impacted all wildlife species dependent upon the deciduous riparian and mesic herbaceous vegetation in sustaining biotic community life. Dependence on portions of the river not inundated by the reservoir is higher than ever today - this means a cooperative land use planning approach - NOT a mono-management and preservation approach. The conglomeration of rangeland, pastures, cropland, deciduous cover and conifer types now provide the food, cover and security for all wildlife and domestic livestock thriving within each ecosystem.

Endangered or Unique Species Introduction

This action listed under Alternative B as a tool to reinstate historical occurence of species such as bighorn sheep, buffalo, ferrets and fox is an experimental approach with a potentially low benefit.

The failure of the Billy Creek bighorn sheep transplant tells the story. Why repeat the transplanting of wildlife species in light of several previous failures on the CMR?

Conversely, transplant elk are now prolific and adapting well in their new environment in the CMR. They feed on private, state and BLM ranges and will continue to expand their use and occupation of other ownerships within similar seasonal ranges. How do we mitigate these impacts on areas outside the CMR?

In short, this action should be considered only on a very limited scale, not as indicated in the proposed action.

Once again Alternative A - No action is the best alternative for the benefit of existing and potential habitat for wildlife.

Forage Allocation

3 Proper use factors for domestic livestock and wildlife have been a subject of confusion and uncertainty in the CMR. On the basis of the 1979 range survey results there is no justification for a 33% reduction in livestock grazing by 1985. Existing livestock numbers on ranges in good and excellent condition need not be reduced to provide more forage for wildlife, if proper use criteria are used. Those ranges in fair and poor condition need to be implemented with prescribed treatment at initial stocking rates at proper use levels on key forage species to sustain yearlong wildlife use.. Forage allocation then should be made on the basis of existing and potential forage production expected under intensive management. There is sufficient evidence of the success of rest-rotation grazing, for example in the Missouri Breaks region, to believe that domestic livestock should be maintained at capacities in line with actual use/proper use data on implemented pastures.

Overall there is a lack of supportive data and information to advocate the Proposed Action (Alternative B). There seems to be only one sound decision - No Action (Alternative A).

Response to Mr. George B. Chaffee

1. Range conditions and wildlife habitat are not the same and should not be used synonymously. Range condition measures such parameters as species composition and projection and does not address important wildlife habitat components such as residual cover, vegetative interspersion, and diversity, nor does it attach sufficient importance to key wildlife shrub communities.

   Because habitat is recognized as the key to wildlife abundance, this document emphasizes habitat quality and quantity.

2. There are presently six rest-rotation and two deferred grazing systems in operation on CMR. None of these systems have been shown to be significantly better for wildlife abundance and diversity than light seasonal grazing with a favorable season of use. Furthermore, intensive systems are a much more expensive alternative and detract more from naturalness than the type of grazing generally suggested in the Proposed Action. However, wildlife and habitat objectives will determine the type of grazing on a specific area.

   The FWS feels that to first set up intensive grazing systems, then monitor response to determine what needs to be manipulated, would be unnecessarily expensive and would place wildlife in a secondary role. This is contrary to the enabling legislation for the area and against the policies of the FWS.

   The FWS agrees with the statement that "adherence to the physiological requirements of the key plant species" is essential to manipulate habitat. However, vegetative requirements and wildlife population objectives have to both be considered in refuge management. Intensive grazing systems rarely can be operated with these constraints in mind.

3. See responses #1 and 2 above.

COMMENT ON THE C.M. RUSSELL DRAFT ENVIRONMENTAL IMPACT STATEMENT
BY MARTIN R. CONNELL, D.V.M., FORT PECK ROUTE, GLASGOW, MONTANA
OCTOBER 30, 1980

OPENING COMMENT:

1 I find the environmental impact statement totally inadequate in dealing with the economic changes that would occur in the local business community if any of the alternatives except "no action" were approved. It is beyond my comprehension that an environmental impact statement can neglect such an important area as the effect on the small communities. Our last census shows that the small communities are already an endangered species. It was my understanding that the CMR was to protect endangered species.

All citizens of the affected counties and the entire State of Montana should be aware of this proposal by the CMR. They have cleverly put in a "no action alternative", which is the carrot on the end of the stick. There is no serious consideration of "No Action".

I submit that this EIS is not a format of alternatives but a Stepped Down Livestock & Recreation Reduction Plan that when instituted will totally eliminate grazing, hunting, recreation, and cabin sites on the lake.

This country has an energy shortage and every available resource must be used to stop our energy dependence upon the Arab world, yet, under this plan it would be impossible to tap any of the energy sources that lie within the range. This statement says to me that we want to live in the 1980's and 1990's like we did in the 1800's but we still want a flush toilet in the house. I feel any proposal should not stop exploration for valuable minerals. I realize that legislation may be necessary to make this change.

REVIEW OF THE REPORT:

I would like to dwell on some of the highlights that I found in reviewing this report.

2 Page IX - The summary states: "No threatened species of animals are known to occur on the refuge. Endangered wildlife species include peregrine falcons, bald eagles and possibly black-footed ferrets. Wildlife habitat on the refuge is only in fair condition". I have consulted biologists and range specialists regarding this situation, and I am told that there is serious doubt that removal of cattle from the CMR would increase the quality of the wildlife habitat. Further discussions revealed that if there are any black-footed ferrets they have been brought in by the Fish & Wildlife. The bald eagle and peregrine falcon populations would not increase if the CMR left the range alone. The only way that their numbers would increase is if the CMR people brought more in. The report further states on this page that "Grazing, and haying activities on the refuge, although limited, contribute to the economy". Is it not important in Eastern Montana to have contribution to the economy?

Page X - The summary states, under Proposed Action Alternative, "Significant management actions would include reduction in livestock grazing as well as changing existing seasons of use and modifying existing grazing systems to benefit wildlife". I do not know how naive the managers of the CMR range are regarding Eastern Montana 3 cattle operations; but one must realize that the grazing season in this area is limited. Even a bureaucrat would have a hard time planning a different grazing season dealing with the logistics of our winters and weather.

4 "Farming along the Missouri River would be phased out but some lure crop farming could be implemented to decrease elk deprivation on private lands". In recent discussions at Montana State University with individuals who have worked with the elk herd in Yellowstone Park and other areas, they state that it will be impossible to keep the elk off private land.

5 The EIS states, "Federal Livestock AUM's would eventually be reduced 33 percent below present levels. Some inholdings would be acquired and ownership of all lands within CMR would be ascertained." Does this mean that they are going to condemn private lands? What has happened to the right of an individual in this country when the government can take away private lands? Something the CMR and government bureaucrats tend to forget is that generations ago many of these lands were settled by pioneers. They worked hard to develop the land and they have passed it down from generation to generation. Along came Fort Peck Lake and flooded the best farm land in Eastern Montana. These people were pushed up on the shore and then along came the CMR and now threathens to push them out entirely. I belive that this is wrong.

6 In a discussion with a member of the CMR staff he revealed that under the "Proposed Action Alternative" they would control the hunting by controlling the access. They do not want any hunting premitted on the CMR.

7 Page XI - "Spawning habitat for fish would be developed on the reservoir". Talking with experts on the problems of spawning fish in Fort Peck Reservoir, they state that the biggest problem to spawning is the fluctuation in the level of the Fort Peck Lake. Does that mean that the CMR is going to take over control from the Corps of Engineers on the water level? They hope to spawn Northern Pike and forget the problems of floods with their water control plan.

8 This EIS statement implies that there will be no control of fires. I can envision, as has happened in the past, that local ranchers will be charged with trespassing for trying to control a fire on CMR ground that threatens to burn their private land. They would lead us to believe that they will stand and watch the fire burn until it reaches the private land and then they will put it out. This sounds good on paper; but obviously they have not fought many fires.

9 They further state in this alternative that private cabins would be eliminated and areas returned to wildlife habitat. More primitive fishing access sites would be provided and they would replace some existing high and low density recreation areas. That means that the sites would be inaccessible.

Under the "Multiple Use Alternative" it says "Wildlife values would be equal to livestock as would recreation". Let us not be naive ... the CMR would be the one determining what is equal not you and I. I do not like the loose wording that says: "Livestock weould receive approximately one-half the allocated forage". That should be spelled out in advance. It also states under this alternative that "Private cabins would remaind as they are", does that mean there would be no improvements and that there would be no further cabins?

Under "No Grazing Alternative" "All private and state inholdings would have to be acquired before elimination of livestock grazing could occur since most of these areas are unfenced and stocked by the the operators at carrying capacity levels'. My questions is how do they plan to do this? The only way that I can see that they could obtain such land would be by condemnation. One thing they forget to say, after stating that "All livestock grazing would be eliminated by the year 2000. The entire refuge boundary would be fenced where possible". By the year 2001 the economic chaos created in the out-lying areas would eventually eliminate man from the CMR.

I feel that at this point that they should add a 6th alternative called "All Livestock Grazing and Recreation and No Wildlife or Bureaucrats". It would take legislation to eliminate the CMR.

Page 1 - The EIS states "Many wildlife-livestock problems at the Charles M. Russell National Wildlife Refuge have resulted from conflicting management and legislation". The conflicting management was when the CMR was given authority over grazing and the conflicting legislation was Public Law making the Fish & Wildlife Service sole administrator of the Wildlife Refuge. Who has caused the problem? The Corps of Engineers hasn't caused the problem, nor has the hunter/fisherman, nor has the recreationist, nor has the rancher. It appears to me that all the problems have been caused by CMR attitudes and employees.

10 Page 5 - Under "Wildlife Objectives" CMR proposes to introduce the endangered species. I believe that it must be made perfectly clear to everyone involved that by allowing the CMR to introduce endangered species to the game range we effectively commit hari-kari! The entire CMR range and surrounding area, state and BLM land, will immediately come under the guidelines of the "Endangered Species Act". This would be disasterous to all forms of recreation, hunting, livestock grazing, and make the present CMR problems sound like a tea party.

Page 12 - The statement that really tickles me is on page 12 where they state "Coyote control to benefit other wildlife species would occur as a last resort". If they are going to let nature take the course then why don't they let nature control the coyotes. The rancher has been portrayed as a vicious villain for trying to control the coyote that kills his sheep and cattle. Now the nature boys tell us they can't run a CMR wildlife refuge without controlling the coyotes...that's interesting. Will they get 10-80 to do it?

Under " Forage Allocation" they state "Livestock grazing on CMR would be substantially reduced to improve habitat conditions for wildlife". At this point it is my strong feeling that independent experts from all phases of livestock grazing, biology, and wildlife management need to be brought together to answer the question if improvement would occur. In visiting with three different individuals on the subject I have consistently received the same answer; the removal of livestock would in all likelihood do very little to improve the wildlife habitat for the entire range. This is especially true on the CMR since such a small part of the range is used for cattle grazing, due to inaccessible terrain, low rain fall, and soil types.

Pages 14-16 - Throughout this report I find a consistant attempt to lure the hunter, historian, fisherman, and recreationist into a sense of well being by statements that say "All existing roads and trails including those that have been closed would be evaluated to determine those that should be improved, realigned or closed". The last hearing angered the hunter, historian, and recreationist causing them to side with the stockman. It is my belief that now they are putting sugar lumps in the package to lure them from the cattlemen's side so they will not object to this program. They go on to state "An additional boat launching, camping, and fishing access site would be developed", "Wildlife populations would be harvested", and "Qualified cultural structures and sites would be offically designated". To concerned citizens, "Harvested" could mean taking animals and putting them in another game range, not necessarily hunting. 11

These are things put into this EIS so that they will appeal to all of the Easterner's who have long since destroyed much of their heritage.

Page 21 - Under "Multiple Use" the opening statement is "This alternative would not be possible to implement unless Congressional action changed CMR from a national wildlife refuge to a multiple sue management area". I believe that strong consideration should be given to legislative changes which would solve our problem. In dealing with the CMR people, I believe that is has become obvious to all that the best interests of Eastern Montana are not being considered by the CMR.

Page 24 - Under "Alternative E (No Grazing)" the intention is to eliminate all livestock, all hunting, all fishing, and all public access and don't you believe for one moment that the CMR people will be swayed form their ultimate goal. 12

Page 27 - They say "Private land closures to public use, already a problem in the area, could be expected to accelerate, further jeopardizing farmer/recreationist/state/federal relations". I have

practiced veterinary medicine in Eastern Montana for 15 years and it appears to me that the only problem that has ever occurred with these relationships are continual harassment by the bureaucrats driving their vehicles all over the land, building fences, and trespassing on ranches. Very few recreationists and hunters have violated fences and land of the farmer/rancher. Most hunting relationships in Eastern Montana are excellent. If you don't believe me, go to the western part of the state and other states where lands are totally closed. When we had the Air Base there was excessive hunting pressure that caused problems, but I believe beyond any shadow of doubt that the relationship between the hunter and the rancher will continue to improve without the government's interference.

Page 30 - Says "These figures indicate that regional effects due to grazing changes on CMR would be insignificant under any of the alternatives. Primarily, effects of grazing changes would be felt by permittees who use refuge lands". This is nonsense. The economic effects will be severe and especially to the related businesses in towns and the people who depend on these cattle for a livelihood. They must be like the ostrich with their head in the sand. They have no idea what is going on and I will not waste my time going through the many allied services and businesses that depend upon livestock grazing. 13

Page 31 - They state that Franklin D. Roosevelt, under Executive Order number 7509, in 1936 started the Fort Peck Game Range. Since that time we have suffered extremely. I think it is time that this group band together and bring about a dissolution of the CMR range.

Page 44 - There is a comment that "Adjacent landowners' and grazing permittees' attitudes are negative toward this expansion and poaching

and illegal shooting could limit further extension of their range". This statement is made regarding the elk. The CMR totally disregards the rights of the permittees and adjacent landowners. They introduce the elk, then increase the size of the herd and push it to the limit. What do they expect landowners to do? They work to put up crops only to see them destroyed by the elk. What would a comparable CMR man and his wife do if their secure dwelling within the city limits was threatened by neighbors putting sheep in their back yard and once the neighbors grass was gone the sheep headed over to the bureaucrats yard?

Page 50 - It states "No endangered or threatened species of plants are known to occur on CMR". Why should any be introduced? If God had wanted it to be there surely in His infinite wisdom He would have seen that they were growing. 14

Page 103 - It states "Elimination of livestock grazing from the refuge could financially ruin many small, family-owned ranching operations which depend primarily upon refuge lands. Those livestock operators suffering high negative impacts in Appendix 10 would probably be forced out of business". I thought our constitution guaranteed every individual the right to the fruits of his efforts.

I seriously doubt the constitutionality of ap proposal that would financially destroy generations of family owned ranches. The CMR bureaucrats admit that destruction is their plan and the tax payer will pay the bill.

It is the time for all in Eastern Montana to band together and fight a battle against the CMR to the bitter end.

SUMMARY:

The Draft Environmental Impact Satement prepared by the CMR staff is incomplete because of the omission of the economic effect on local communities and businesses. 15

It is not a plan with five alternatives for action; but rather a plan to be implemented in five phases with the ultimate goal being elimination of all livestock grazing, hunting, fishing, and recreation. This includes the condemnation of private and state lands within the game range and removal of all cabin sites. 16

The CMR bureaucrats intend to accomplish this take over by the introduction of endangered species, thereby bringing the entire area under the Endangered Species Act. The statement admits that "many small family owned ranching operations ..... would be financially ruined".

SOLUTIONS:

A unified approach by all affected parties banning together into a cohesive group to stop the CMR take-over plan.

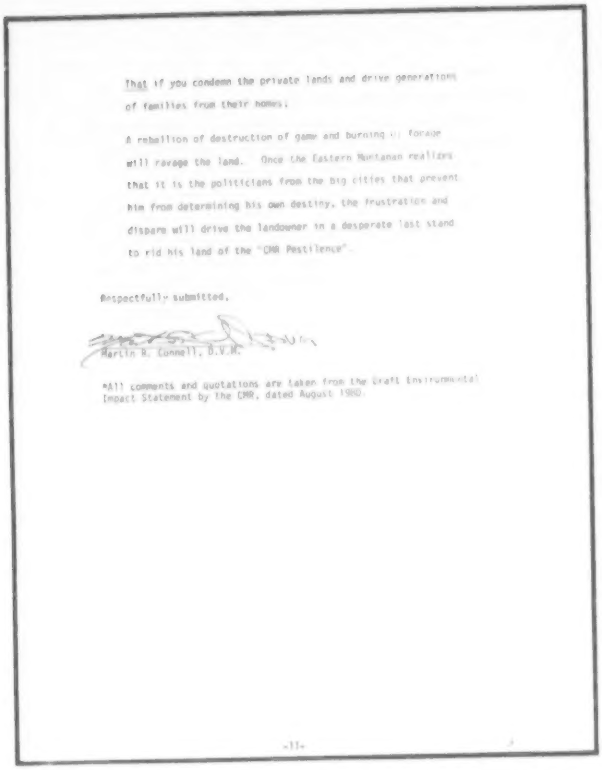
This group would be faced with intense negotiations with the CMR people to reach an acceptable alternative.

Simultaneously task forces will develop specific legislation to stop or eradicate the CMR.

CHALLENGE TO THE CMR BUREAUCRATS

I Predict:

That if you persist in driving the livestockman, hunters, fisherman, and recreationist from the game range,



That if you condemn the private lands and drive generations of families from their homes;

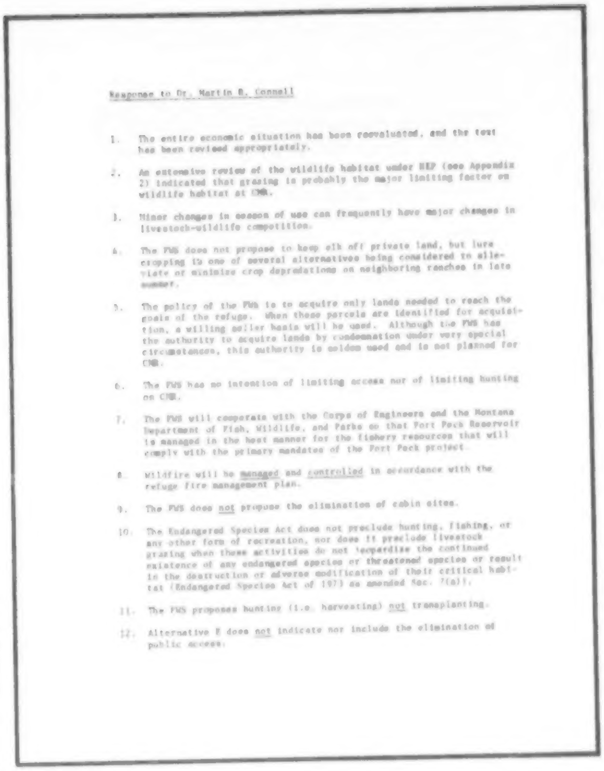
A rebellion of destruction of game and burning of forage will ravage the land. Once the Eastern Montanan realizes that it is the politicians from the big cities that prevent him from determining his own destiny, the frustration and dispare will drive the landowner in a desperate last stand to rid his land of the "CMR Pestilence".

Respectfully submitted,

Martin R. Connell, D.V.M.

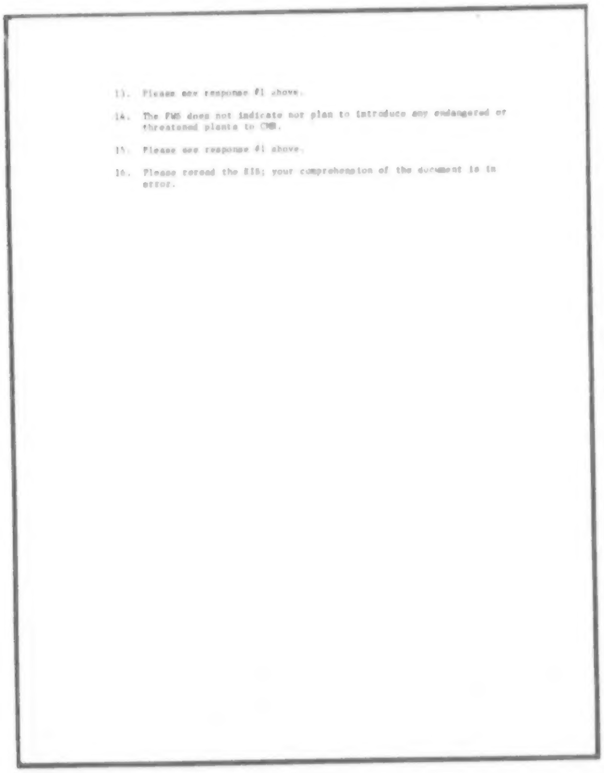
*All comments and quotations are taken from the Draft Environmental Impact Statement by the CMR, dated August 1980.

-11-

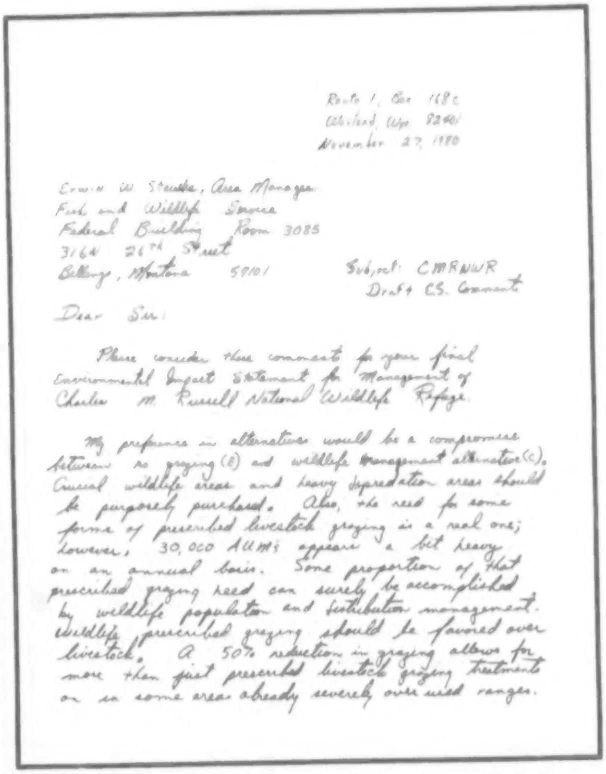


Response to Dr. Martin R. Connell

1. The entire economic situation has been reevaluated, and the text has been revised appropriately.
2. An extensive review of the wildlife habitat under HEP (see Appendix 2) indicated that grazing is probably the major limiting factor on wildlife habitat at CMR.
3. Minor changes in season of use can frequently have major changes in livestock-wildlife competition.
4. The FWS does not propose to keep elk off private land, but lure cropping is one of several alternatives being considered to alleviate or minimize crop depredations on neighboring ranches in late summer.
5. The policy of the FWS is to acquire only lands needed to reach the goals of the refuge. When those parcels are identified for acquisition, a willing seller basis will be used. Although the FWS has the authority to acquire lands by condemnation under very special circumstances, this authority is seldom used and is not planned for CMR.
6. The FWS has no intention of limiting access nor of limiting hunting on CMR.
7. The FWS will cooperate with the Corps of Engineers and the Montana Department of Fish, Wildlife, and Parks so that Fort Peck Reservoir is managed in the best manner for the fishery resources that will comply with the primary mandates of the Fort Peck project.
8. Wildfire will be managed and controlled in accordance with the refuge fire management plan.
9. The FWS does not propose the elimination of cabin sites.
10. The Endangered Species Act does not preclude hunting, fishing, or any other form of recreation, nor does it preclude livestock grazing when these activities do not jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of their critical habitat (Endangered Species Act of 1973 as amended Sec. 7(a)).
11. The FWS proposes hunting (i.e. harvesting) not transplanting.
12. Alternative E does not indicate nor include the elimination of public access.



13. Please see response #1 above.
14. The FWS does not indicate nor plan to introduce any endangered or threatened plants to CMR.
15. Please see response #1 above.
16. Please reread the EIS; your comprehension of the document is in error.



Route 1, Box 168c
Worland, Wyo 82401
November 27, 1980

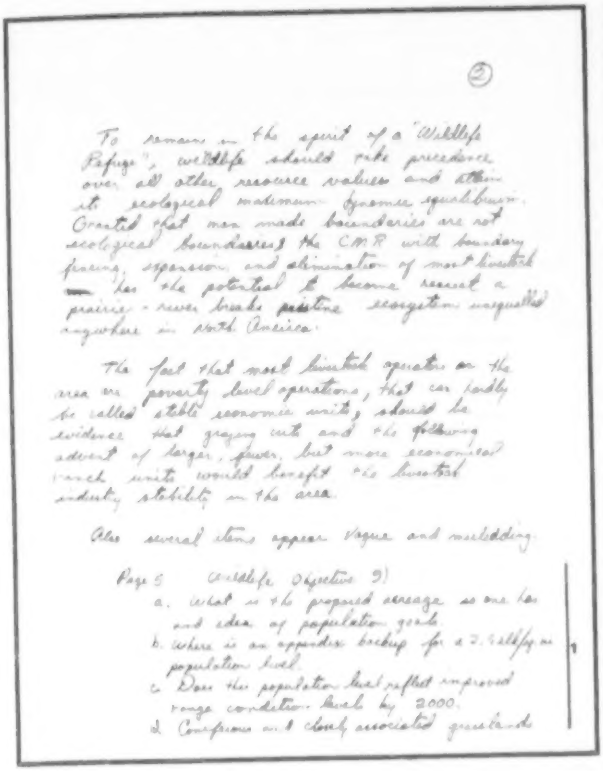
Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building Room 3085
316 N 26th Street
Billings, Montana 59101

Subject: CMRNWR
Draft E.S. Comments

Dear Sir:

Please consider these comments for your final Environmental Impact Statement for Management of Charles M. Russell National Wildlife Refuge.

My preference in alternatives would be a compromise between no grazing (E) and wildlife management alternative (C). Crucial wildlife areas and heavy depredation areas should be purposely purchased. Also, the need for some form of prescribed livestock grazing is a real one; however, 30,000 AUM's appears a bit heavy on an annual basis. Some proportion of that prescribed grazing need can surely be accomplished by wildlife population and distribution management. Wildlife prescribed grazing should be favored over livestock. A 50% reduction in grazing allows for more than just prescribed livestock grazing treatments on in some area already severely over used ranges.



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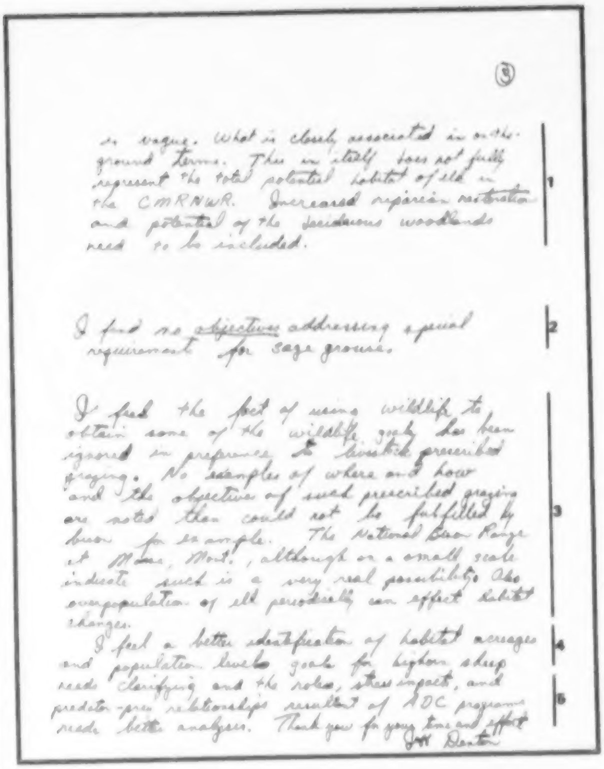
To remain in the spirit of a "Wildlife Refuge", wildlife should take precedence over all other resource values and attain its ecological maximum dynamic equilibrium. Granted that man made boundaries are not ecological boundaries, the CMR with boundary fencing, expansion, and elimination of most livestock has the potential to become reveal a prairie - river breaks pristine ecosystem unequalled anywhere in North America.

The fact that most livestock operators on the area are poverty level operations, that can hardly be called stable economic units, should be evidence that grazing cuts and the following advent of larger, fewer, but more economical ranch units would benefit the livestock industry stability in the area.

Also several items appear vague and misleading.

Page 5 Wildlife Objective 9)
a. What is the proposed acreage so one has and idea of population goals.
b. Where is an appendix backup for a [illegible] population level. 1
c. Does this population level reflect improved range condition levels by 2000.
d. Coniferous and closely associated grasslands



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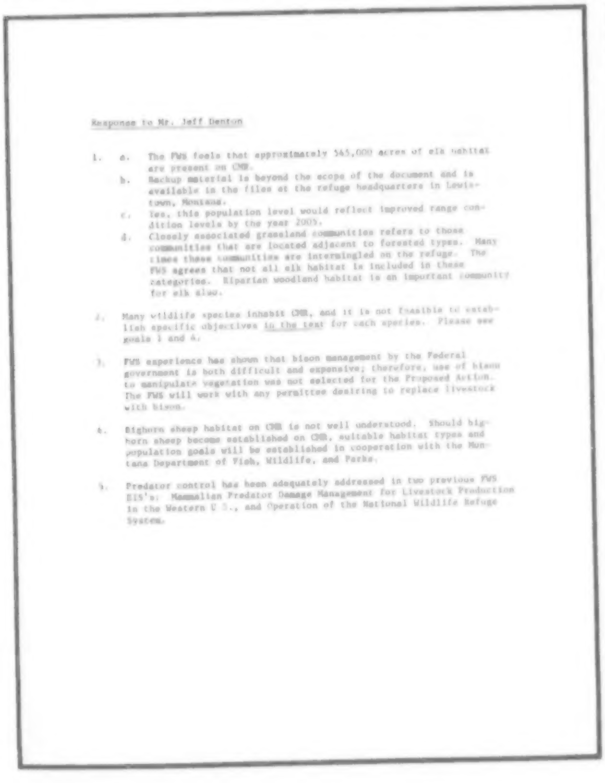
is vague. What is closely associated in on-the-ground terms. This in itself does not fully represent the total potential habitat of elk in the CMRNWR. Increased riparian restoration and potential of the deciduous woodlands need to be included. 1

I find no objectives addressing special requirement for sage grouse. 2

I feel the fact of using wildlife to obtain some of the wildlife goals has been ignored in preference to livestock prescribed grazing. No examples of where and how and the objective of such prescribed grazing are noted than could not be fulfilled by bison for example. The National Bison Range at Moiese, Mont., although on a small scale indicate such is a very real possibility. Also overpopulation of elk periodically can effect habitat changes. 3

I feel a better identification of habitat acreages and population levels goals for bighorn sheep needs clarifying 4 and the roles, stress impact, and predator-prey relationships resultant of ADC programs needs better analyses. 5 Thank you for your time and effort

Jeff Denton



Response to Mr. Jeff Denton

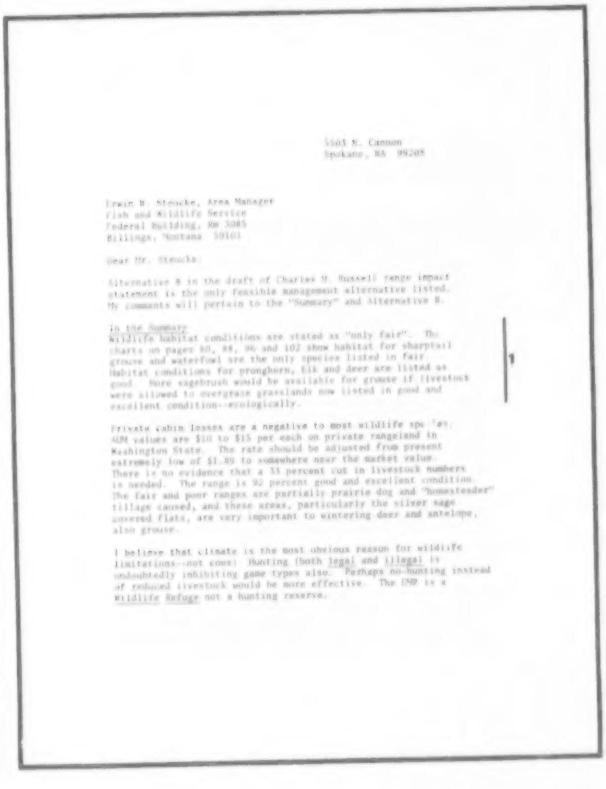
1. a. The FWS feels that approximately 565,000 acres of elk habitat are present on CMR.
   b. Backup material is beyond the scope of the document and is available in the files at the refuge headquarters in Lewistown, Montana.
   c. Yes, this population level would reflect improved range condition levels by the year 2005.
   d. Closely associated grassland communities refers to those communities that are located adjacent to forested types. Many times these communities are intermingled on the refuge. The FWS agrees that not all elk habitat is included in these categories. Riparian woodland habitat is an important community for elk also.

2. Many wildlife species inhabit CMR, and it is not feasible to establish specific objectives in the text for each species. Please see goals 1 and 4.

3. FWS experience has shown that bison management by the Federal government is both difficult and expensive; therefore, use of bison to manipulate vegetation was not selected for the Proposed Action. The FWS will work with any permittee desiring to replace livestock with bison.

4. Bighorn sheep habitat on CMR is not well understood. Should bighorn sheep become established on CMR, suitable habitat types and population goals will be established in cooperation with the Montana Department of Fish, Wildlife, and Parks.

5. Predator control has been adequately addressed in two previous FWS EIS's: Mammalian Predator Damage Management for Livestock Production in the Western U.S., and Operation of the National Wildlife Refuge System.



5503 N. Cannon
Spokane, WA 99208

Erwin B. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Rm 3085
Billings, Montana 59101

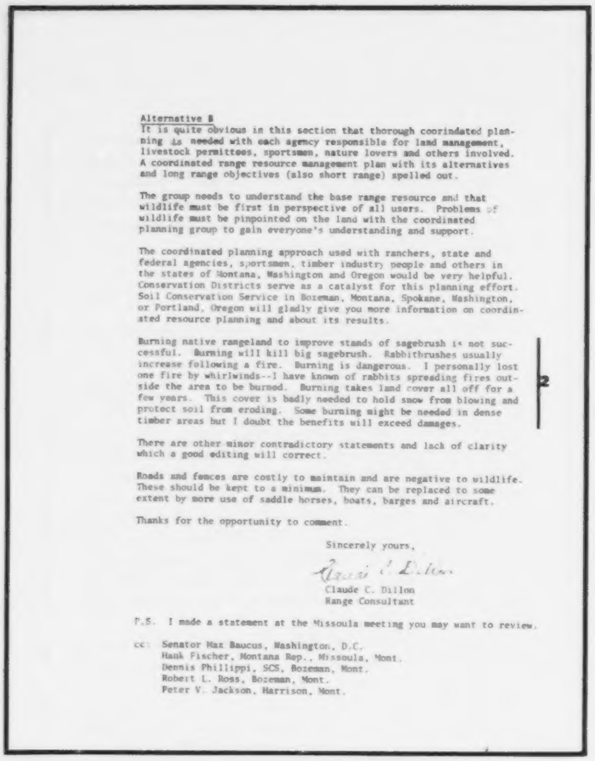
Dear Mr. Steucke:

Alternative B in the draft of Charles M. Russell range impact statement is the only feasible management alternative listed. My comments will pertain to the "Summary" and Alternative B.

In the Summary
Wildlife habitat conditions are stated as "only fair". The charts on pages 80, 88, 96 and 102 show habitat for sharptail grouse and waterfowl are the only species listed in fair. Habitat conditions for pronghorn, Elk and deer are listed as good. More sagebrush would be available for grouse if livestock were allowed to overgraze grasslands now listed in good and excellent condition--ecologically. 1

Private cabin leases are a negative to most wildlife species. AUM values are $10 to $15 per each on private rangeland in Washington State. The rate should be adjusted from present extremely low of $1.89 to somewhere near the market value. There is no evidence that a 33 percent cut in livestock numbers is needed. The range is 92 percent good and excellent condition. The fair and poor ranges are partially prairie dog and "homesteader" tillage caused, and these areas, particularly the silver sage covered flats, are very important to wintering deer and antelope, also grouse.

I believe that climate is the most obvious reason for wildlife limitations--not cows! Hunting (both legal and illegal) is undoubtedly inhibiting game types also. Perhaps no-hunting instead of reduced livestock would be more effective. The CMR is a Wildlife Refuge not a hunting reserve.



Alternative B
It is quite obvious in this section that thorough coorindated planning is needed with each agency responsible for land management, livestock permittees, sportsmen, nature lovers and others involved. A coordinated range resource management plan with its alternatives and long range objectives (also short range) spelled out.

The group needs to understand the base range resource and that wildlife must be first in perspective of all users. Problems of wildlife must be pinpointed on the land with the coordinated planning group to gain everyone's understanding and support.

The coordinated planning approach used with ranchers, state and federal agencies, sportsmen, timber industry people and others in the states of Montana, Washington and Oregon would be very helpful. Conservation Districts serve as a catalyst for this planning effort. Soil Conservation Service in Bozeman, Montana, Spokane, Washington, or Portland, Oregon will gladly give you more information on coordinated resource planning and about its results.

Burning native rangeland to improve stands of sagebrush is not successful. Burning will kill big sagebrush. Rabbitbrushes usually increase following a fire. Burning is dangerous. I personally lost one fire by whirlwinds--I have known of rabbits spreading fires outside the area to be burned. Burning takes land cover all off for a few years. This cover is badly needed to hold snow from blowing and protect soil from eroding. Some burning might be needed in dense timber areas but I doubt the benefits will exceed damages. 2

There are other minor contradictory statements and lack of clarity which a good editing will correct.

Roads and fences are costly to maintain and are negative to wildlife. These should be kept to a minimum. They can be replaced to some extent by more use of saddle horses, boats, barges and aircraft.

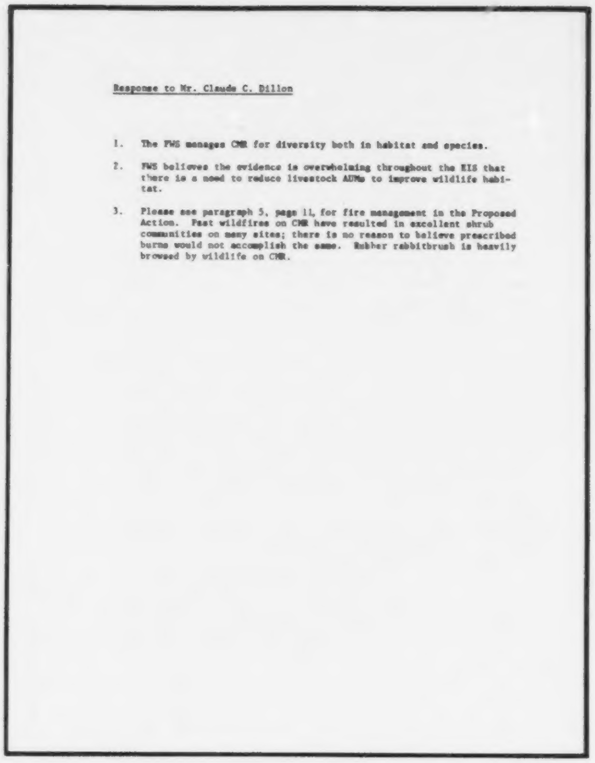
Thanks for the opportunity to comment.

Sincerely yours,

Claude C. Dillon
Range Consultant

P.S. I made a statement at the Missoula meeting you may want to review.

cc: Senator Max Baucus, Washington, D.C.
Hank Fischer, Montana Rep., Missoula, Mont.
Dennis Phillippi, SCS, Bozeman, Mont.
Robert L. Ross, Bozeman, Mont.
Peter V. Jackson, Harrison, Mont.



Response to Mr. Claude C. Dillon

1. The FWS manages CMR for diversity both in habitat and species.

2. FWS believes the evidence is overwhelming throughout the EIS that there is a need to reduce livestock AUMs to improve wildlife habitat.

3. Please see paragraph 5, page 11, for fire management in the Proposed Action. Past wildfires on CMR have resulted in excellent shrub communities on many sites; there is no reason to believe prescribed burns would not accomplish the same. Rubber rabbitbrush is heavily browsed by wildlife on CMR.

1780 Arlington Drive
Missoula, Montana 59801
November 30, 1980

Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3085
Billings, Montana 59101

Dear Sir,

We are responding to the draft environmental impact statement on the management of the Charles M. Russell National Wildlife Refuge. We support the issuance of an impact statement and your efforts to do so. It will provide and does general and much needed direction for managing the uses of the resources on the refuge.

In general, we favor Alternative B (Proposed Action). However, in the final draft we would like the following direction added to Alternative B:

1 - Stocking rates calculated for domestic livestock are consistent with wildlife objectives and will either improve or have no negative impacts on wildlife species or their habitat.

2 - Direction should be provided to improve the cover-forage ratios for all wildlife species. 1

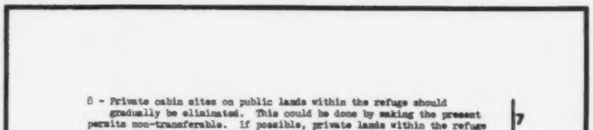
3 - A pond development program should be initiated and sustained to provide water for wildlife in areas where water is limited and/or in short supply during critical periods. Cover and forage should be protected in the area immediately adjacent to these developments. 2

4 - A program should be initiated immediately to protect and improve wildlife habitat in all reparian zones. 3

5 - Peregrine falcons, black-footed ferrets, swift fox, bighorn sheep and buffalo should be reintroduced. Number of species to be reintroduced should be tied to the carrying capacity of the land and should be determined when more specific data is available. 4

6 - A program should be initiated to provide for wildlife easements and, if necessary, acquisition of private lands immediately adjacent to the refuge which are needed for wildlife purposes. 5

7 - Construction of developed campgrounds, floatplane landings, boat launching sites and etc. should be carried out only if the construction and use of such facilities would have no negative impacts on the wildlife resource. A program of dispersed recreation opportunities should be favored over developed sites. It is more cost effective and fits in better with the objectives of a wildlife refuge. 6



8 - Private cabin sites on public lands within the refuge should gradually be eliminated. This could be done by making the present permits non-transferable. If possible, private lands within the refuge boundaries should be acquired through purchase. 7

General comment: In Appendix 9, pages 177-180, allotment range conditions were placed in four classes. It appears that these are a combination of primary and secondary ranges. Conditions of the range should be based on primary ranges only and only primary ranges should be used to determine carrying capacity. 8

The 33% refuge-wide reduction in domestic livestock grazing should be born largely by the individual permittees (not grazing associations) who have a herd size of 500 plus head (Appendix 10).

We appreciate greatly, the opportunity to comment and your efforts to solicit public input.

Sincerely yours,
Darlene Grove
John Grove
Chris L Grove

Responses to the Grove Family

1. Habitat management plans will focus on wildlife habitat (including cover and forage) and will prescribe grazing systems and rates consistent with achieving wildlife objectives.

2. In examination of HEP values compiled on allotments on the refuge, it has been concluded that additional water development would be detrimental to most wildlife species in that it would distribute livestock into areas now used almost exclusively by wildlife and that are needed by wildlife.

3. See response #1 above.

4. After careful consideration, the FWS has decided the overall impacts of a refuge-controlled bison herd are unacceptable and are not considered at this time in the Proposed Action. However, the FWS will consider livestock permittees running private bison herds in place of cattle.

5. The FWS has no plans to expand the refuge but will consider wildlife easements for private inholdings at CMR.

6. Compatibility with wildlife objectives is one criterion in recreation development.

7. The private cabin leases are under the authority of the Corps of Engineers, and the FWS does not propose for the COE to eliminate them.

8. Appendix 9, pages 179-182 is indeed a total of all ranges or range sites by condition class. After an initial inventory to establish range site, condition, and acreage, the AUM recommendations were subjected to a slope/water matrix in addition to soil restrictions. See Appendix 15, pages 195-199, DEIS. This analysis allocated forage to livestock only on what was primary livestock ranges.

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510 Nevada Avenue
Libby, MT 59923
November 21, 1980

Erwin W. Steucke, Area Manager
Fish & Wildlife Service
Federal Building, Room 3085
316 North 26th Street
Billings, MT 59101

Dear Mr. Steucke:

I appreciate the opportunity given to comment on the Draft Environmental Statement for management of the C.M. Russell Wildlife Refuge. I am however, due to the very limited amount of time available, finding it extremely difficult to fully comprehend and then make a rational evaluation. I just recieved a copy of the plan on a recent hunting trip to the area and have less than a day to make the review. Also my total direct experience to this land is limited to only two visits of about ten days each.

The first and most significant ommission that I have discovered is the bland way the most important resource was discussed. I am referring to the people living adjacent and near to the wildlife refuge. They and their ancestor who developed the area offer much more to our society than any number of wildlife or exotic species that might exist or be introduced in the future. There still exists amongst this hardy group a spirit of independence and self reliance that is nearly nonexistant in our general society. I believe that the number one priority and objective of any plan must be to preserve this unique and nearly extinct resource. Cattle ranching is their way of life, so every effort must be undertaken that prevents the weakening of this economy, while still adequately protecting our non-renewable resource the soil. I believe this can be accomplished without sacrificing or threatening the presently abundant herds of big game animals which I feel are the second most important resource of the area. 1

I believe an adequate vegitation and soil resource inventory was made, however, the sociological inventory and discussion is extremely muddled without a deliberate attempt to use the data presented. An economic analysis as required by the National Environmental Policy Act has not been made. 2

During my recent visits to the area I have been astounded by the rapid and wanton destruction wrought by the uncontrolled activities of the prairie dog. I can't believe that a responsible land managing agency would permit this obivious desecration to the land to occur. 3

I am opposed to the re-introduction of any wildlife species including the black foote ferret into the area. Once this is done any area which is then used by this species becomes sacred and all other resources become secondary or if in conflict eliminated. 4

Quit blocking vehicle routes. Everyone recognizes that damage does occur from excessive use the present and even projected use to the C.M.R. is minimal in relation to its size. I believe that rather than spending money to restrict use it is far better and probably less expensive to rehabilitate the local areas where excessive damage occurs. Manage the area for people not for the sake of wildlife. Also with the short time I have had to review this statement no where have I seen a proposed transportation plan. Is there one? 5

There are many more items in your report that I question the validity of. One is the relationship of slope versus water relative to cattle use. I would have to believe that a relationship of use is more closely related to a water-vegitative type than exists between water and slope. I am certain that by correlation of these three variables a much more accurate use projection would occur. 6

I must appologize for the jumbled response that I have prepared. My only hope is that you will not in haste make management decisions that are locked in without due consideration of present use. I believe that management of our public lands must be for the well being of the majority of people, not the few in the special interest population.

Thank you for this opportunity to respond.

Sincerely yours,

Bill Barner

Response to Mr. Bill Harner

1. FWS agrees with your assessment of CMR neighbors and will make every effort to work with them.

2. The entire economic situation has been reevaluated and the text rewritten to reflect the changes.

3. Prairie dogs are not usually the causative agent but are opportunists which take advantage of past misuse or overuse of an area. They are wildlife and are extremely important to many other associated species.

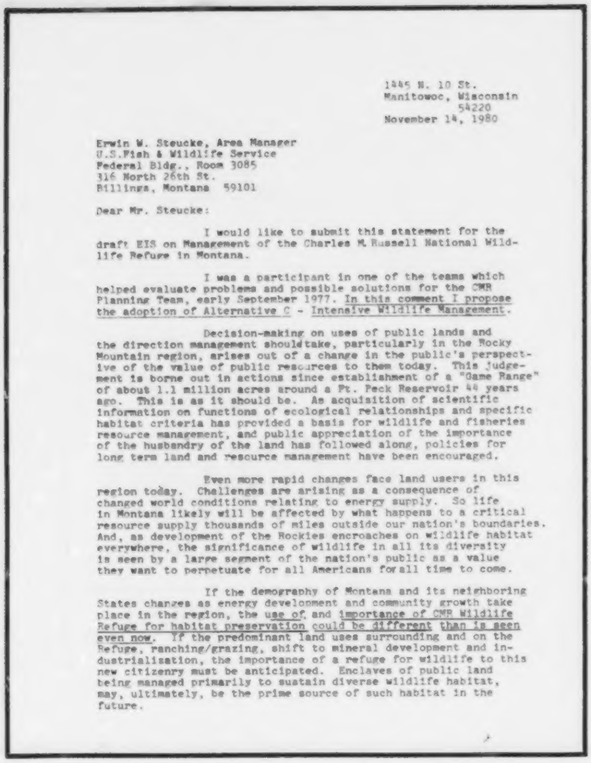
4. The endangered species act does not preclude hunting, fishing, or any other form of recreation, nor does it preclude livestock grazing when these activities do not jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of their critical habitat.

5. Several hundred miles of designated roads exist on the refuge. Those suitable for continued use will remain open, while those susceptible to landslides, washouts, and wildlife conflicts may be abandoned or changed. Essentially, the road pattern will remain the same.

   A transportation plan is beyond the scope of an EIS. The travel map is available for distribution to the public at the Lewistown, Slippery Ann, Jordan, and Fort Peck headquarters.

6. This concept is based on well-documented studies by Mackie (1970) and Knowles (1975).

READEX FICHE



1445 N. 10 St.
Manitowoc, Wisconsin
54220
November 14, 1980

Erwin W. Steucke, Area Manager
U.S.Fish & Wildlife Service
Federal Bldg., Room 3085
316 North 26th St.
Billings, Montana 59101

Dear Mr. Steucke:

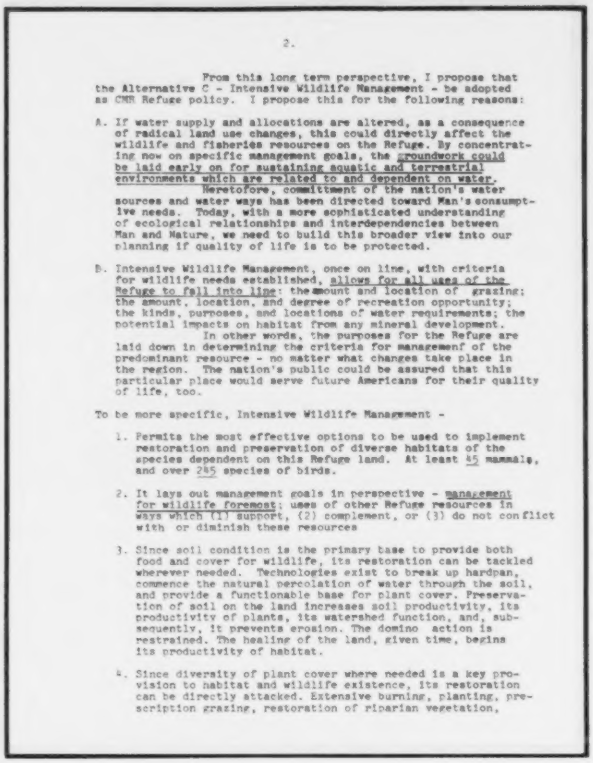
I would like to submit this statement for the draft EIS on Management of the Charles M. Russell National Wildlife Refuge in Montana.

I was a participant in one of the teams which helped evaluate problems and possible solutions for the CMR Planning Team, early September 1977. In this comment I propose the adoption of Alternative C - Intensive Wildlife Management.

Decision-making on uses of public lands and the direction management shouldtake, particularly in the Rocky Mountain region, arises out of a change in the public's perspective of the value of public resources to them today. This judgement is borne out in actions since establishment of a "Game Range" of about 1.1 million acres around a Ft. Peck Reservoir 44 years ago. This is as it should be. As acquisition of scientific information on functions of ecological relationships and specific habitat criteria has provided a basis for wildlife and fisheries resource management, and public appreciation of the importance of the husbandry of the land has followed along, policies for long term land and resource management have been encouraged.

Even more rapid changes face land users in this region today. Challenges are arising as a consequence of changed world conditions relating to energy supply. So life in Montana likely will be affected by what happens to a critical resource supply thousands of miles outside our nation's boundaries. And, as development of the Rockies encroaches on wildlife habitat everywhere, the significance of wildlife in all its diversity is seen by a large segment of the nation's public as a value they want to perpetuate for all Americans forall time to come.

If the demography of Montana and its neighboring States changes as energy development and community growth take place in the region, the use of, and importance of CMR Wildlife Refuge for habitat preservation could be different than is seen even now. If the predominant land uses surrounding and on the Refuge, ranching/grazing, shift to mineral development and industrialization, the importance of a refuge for wildlife to this new citizenry must be anticipated. Enclaves of public land being managed primarily to sustain diverse wildlife habitat, may, ultimately, be the prime source of such habitat in the future.



From this long term perspective, I propose that the Alternative C - Intensive Wildlife Management - be adopted as CMR Refuge policy. I propose this for the following reasons:

A. If water supply and allocations are altered, as a consequence of radical land use changes, this could directly affect the wildlife and fisheries resources on the Refuge. By concentrating now on specific management goals, the groundwork could be laid early on for sustaining aquatic and terrestrial environments which are related to and dependent on water.
Heretofore, committment of the nation's water sources and water ways has been directed toward Man's consumptive needs. Today, with a more sophisticated understanding of ecological relationships and interdependencies between Man and Nature, we need to build this broader view into our planning if quality of life is to be protected.

B. Intensive Wildlife Management, once on line, with criteria for wildlife needs established, allows for all uses of the Refuge to fall into line: the amount and location of grazing; the amount, location, and degree of recreation opportunity; the kinds, purposes, and locations of water requirements; the potential impacts on habitat from any mineral development.
In other words, the purposes for the Refuge are laid down in determining the criteria for management of the predominant resource - no matter what changes take place in the region. The nation's public could be assured that this particular place would serve future Americans for their quality of life, too.

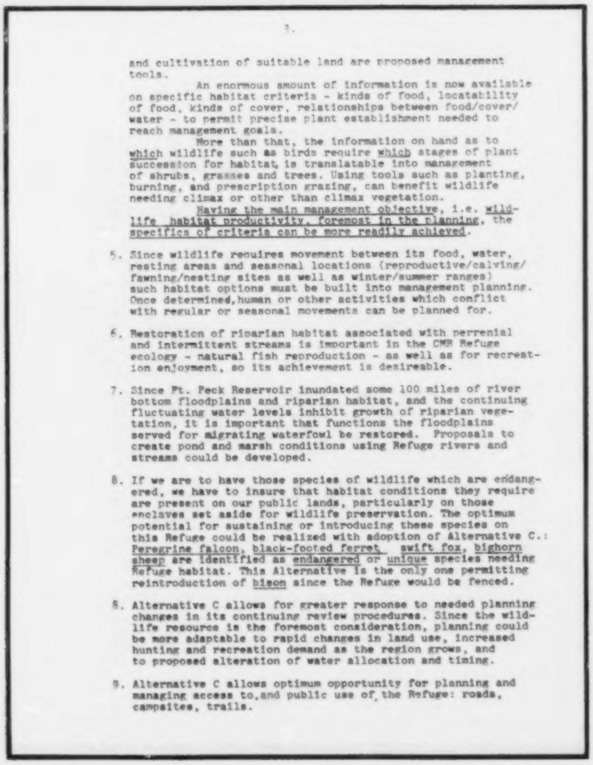
To be more specific, Intensive Wildlife Management -

1. Permits the most effective options to be used to implement restoration and preservation of diverse habitats of the species dependent on this Refuge land. At least 45 mammals, and over 245 species of birds.

2. It lays out management goals in perspective - management for wildlife foremost; uses of other Refuge resources in ways which (1) support, (2) complement, or (3) do not conflict with or diminish these resources

3. Since soil condition is the primary base to provide both food and cover for wildlife, its restoration can be tackled wherever needed. Technologies exist to break up hardpan, commence the natural percolation of water through the soil, and provide a functionable base for plant cover. Preservation of soil on the land increases soil productivity, its productivity of plants, its watershed function, and, subsequently, it prevents erosion. The domino action is restrained. The healing of the land, given time, begins its productivity of habitat.

4. Since diversity of plant cover where needed is a key provision to habitat and wildlife existence, its restoration can be directly attacked. Extensive burning, planting, prescription grazing, restoration of riparian vegetation,



and cultivation of suitable land are proposed management tools.

An enormous amount of information is now available on specific habitat criteria - kinds of food, locatability of food, kinds of cover, relationships between food/cover/water - to permit precise plant establishment needed to reach management goals.

More than that, the information on hand as to which wildlife such as birds require which stages of plant succession for habitat, is translatable into management of shrubs, grasses and trees. Using tools such as planting, burning, and prescription grazing, can benefit wildlife needing climax or other than climax vegetation.

Having the main management objective, i.e. wildlife habitat productivity, foremost in the planning, the specifics of criteria can be more readily achieved.

5. Since wildlife requires movement between its food, water, resting areas and seasonal locations (reproductive/calving/fawning/nesting sites as well as winter/summer ranges) such habitat options must be built into management planning. Once determined, human or other activities which conflict with regular or seasonal movements can be planned for.

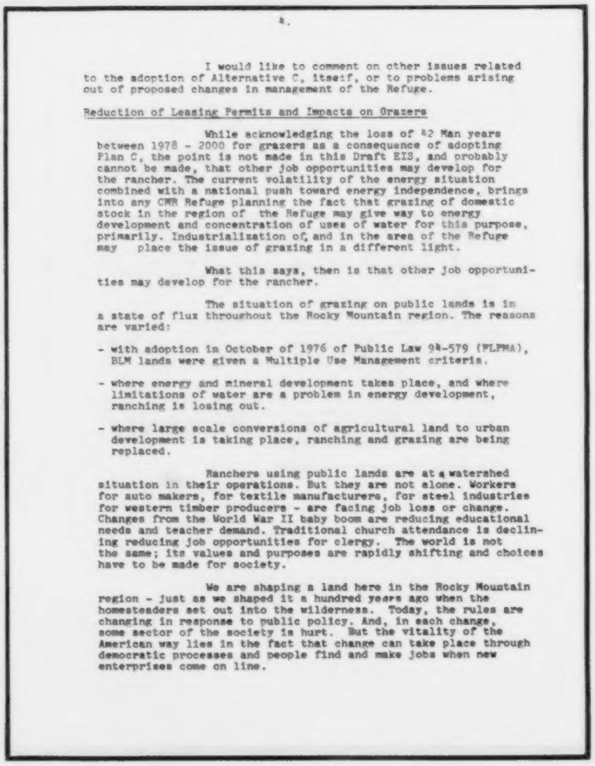
6. Restoration of riparian habitat associated with perrenial and intermittent streams is important in the CMR Refuge ecology - natural fish reproduction - as well as for recreation enjoyment, so its achievement is desireable.

7. Since Ft. Peck Reservoir inundated some 100 miles of river bottom floodplains and riparian habitat, and the continuing fluctuating water levels inhibit growth of riparian vegetation, it is important that functions the floodplains served for migrating waterfowl be restored. Proposals to create pond and marsh conditions using Refuge rivers and streams could be developed.

8. If we are to have those species of wildlife which are endangered, we have to insure that habitat conditions they require are present on our public lands, particularly on those enclaves set aside for wildlife preservation. The optimum potential for sustaining or introducing these species on this Refuge could be realized with adoption of Alternative C.: Peregrine falcon, black-footed ferret, swift fox, bighorn sheep are identified as endangered or unique species needing Refuge habitat. This Alternative is the only one permitting reintroduction of bison since the Refuge would be fenced.

8. Alternative C allows for greater response to needed planning changes in its continuing review procedures. Since the wildlife resource is the foremost consideration, planning could be more adaptable to rapid changes in land use, increased hunting and recreation demand as the region grows, and to proposed alteration of water allocation and timing.

9. Alternative C allows optimum opportunity for planning and managing access to, and public use of, the Refuge: roads, campsites, trails.



I would like to comment on other issues related to the adoption of Alternative C, itself, or to problems arising out of proposed changes in management of the Refuge.

Reduction of Leasing Permits and Impacts on Grazers

While acknowledging the loss of 42 Man years between 1978 - 2000 for grazers as a consequence of adopting Plan C, the point is not made in this Draft EIS, and probably cannot be made, that other job opportunities may develop for the rancher. The current volatility of the energy situation combined with a national push toward energy independence, brings into any CMR Refuge planning the fact that grazing of domestic stock in the region of the Refuge may give way to energy development and concentration of uses of water for this purpose, primarily. Industrialization of, and in the area of the Refuge may place the issue of grazing in a different light.

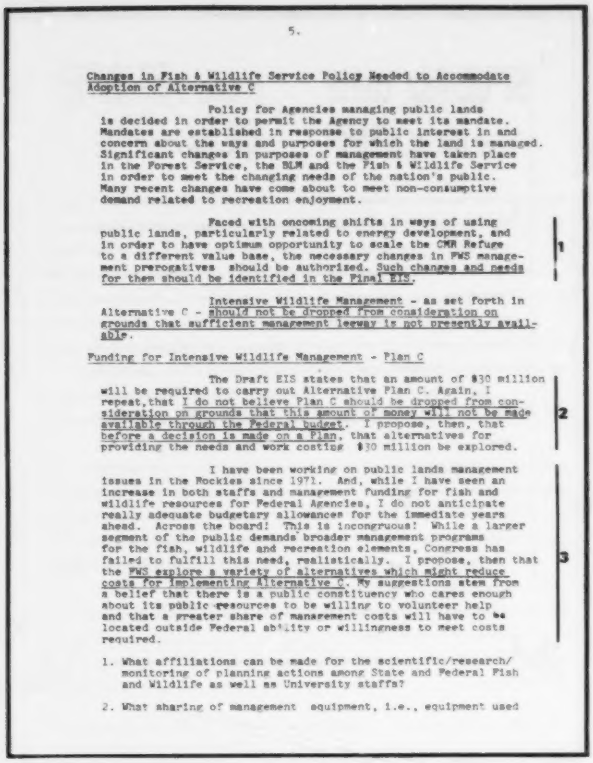
What this says, then is that other job opportunities may develop for the rancher.

The situation of grazing on public lands is in a state of flux throughout the Rocky Mountain region. The reasons are varied:

- with adoption in October of 1976 of Public Law 94-579 (FLPMA), BLM lands were given a Multiple Use Management criteria.
- where energy and mineral development takes place, and where limitations of water are a problem in energy development, ranching is losing out.
- where large scale conversions of agricultural land to urban development is taking place, ranching and grazing are being replaced.

Ranchers using public lands are at a watershed situation in their operations. But they are not alone. Workers for auto makers, for textile manufacturers, for steel industries for western timber producers - are facing job loss or change. Changes from the World War II baby boom are reducing educational needs and teacher demand. Traditional church attendance is declining reducing job opportunities for clergy. The world is not the same; its values and purposes are rapidly shifting and choices have to be made for society.

We are shaping a land here in the Rocky Mountain region - just as we shaped it a hundred years ago when the homesteaders set out into the wilderness. Today, the rules are changing in response to public policy. And, in each change, some sector of the society is hurt. But the vitality of the American way lies in the fact that change can take place through democratic processes and people find and make jobs when new enterprises come on line.



Changes in Fish & Wildlife Service Policy Needed to Accommodate Adoption of Alternative C

Policy for Agencies managing public lands is decided in order to permit the Agency to meet its mandate. Mandates are established in response to public interest in and concern about the ways and purposes for which the land is managed. Significant changes in purposes of management have taken place in the Forest Service, the BLM and the Fish & Wildlife Service in order to meet the changing needs of the nation's public. Many recent changes have come about to meet non-consumptive demand related to recreation enjoyment.

Faced with oncoming shifts in ways of using public lands, particularly related to energy development, and in order to have optimum opportunity to scale the CMR Refuge to a different value base, the necessary changes in FWS management prerogatives should be authorized. Such changes and needs for them should be identified in the Final EIS. 1

Intensive Wildlife Management - as set forth in Alternative C - should not be dropped from consideration on grounds that sufficient management leeway is not presently available.

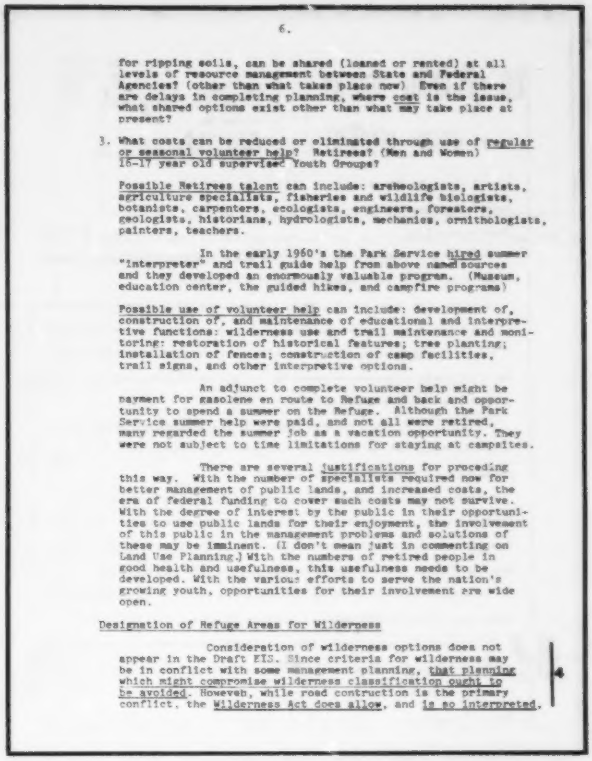
Funding for Intensive Wildlife Management - Plan C

The Draft EIS states that an amount of $30 million will be required to carry out Alternative Plan C. Again, I repeat, that I do not believe Plan C should be dropped from consideration on grounds that this amount of money will not be made available through the Federal budget. I propose, then, that before a decision is made on a Plan, that alternatives for providing the needs and work costing $30 million be explored. 2

I have been working on public lands management issues in the Rockies since 1971. And, while I have seen an increase in both staffs and management funding for fish and wildlife resources for Federal Agencies, I do not anticipate really adequate budgetary allowances for the immediate years ahead. Across the board! This is incongruous! While a larger segment of the public demands broader management programs for the fish, wildlife and recreation elements, Congress has failed to fulfill this need, realistically. I propose, then that the FWS explore a variety of alternatives which might reduce costs for implementing Alternative C. My suggestions stem from a belief that there is a public constituency who cares enough about its public resources to be willing to volunteer help and that a greater share of management costs will have to be located outside Federal ability or willingness to meet costs required. 3

1. What affiliations can be made for the scientific/research/monitoring of planning actions among State and Federal Fish and Wildlife as well as University staffs?

2. What sharing of management equipment, i.e., equipment used



for ripping soils, can be shared (loaned or rented) at all levels of resource management between State and Federal Agencies? (other than what takes place now) Even if there are delays in completing planning, where cost is the issue, what shared options exist other than what may take place at present?

3. What costs can be reduced or eliminated through use of regular or seasonal volunteer help? Retirees? (Men and Women) 16-17 year old supervised Youth Groups?

Possible Retirees talent can include: archeologists, artists, agriculture specialists, fisheries and wildlife biologists, botanists, carpenters, ecologists, engineers, foresters, geologists, historians, hydrologists, mechanics, ornithologists, painters, teachers.

In the early 1960's the Park Service hired summer "interpreter" and trail guide help from above named sources and they developed an enormously valuable program. (Museum, education center, the guided hikes, and campfire programs)

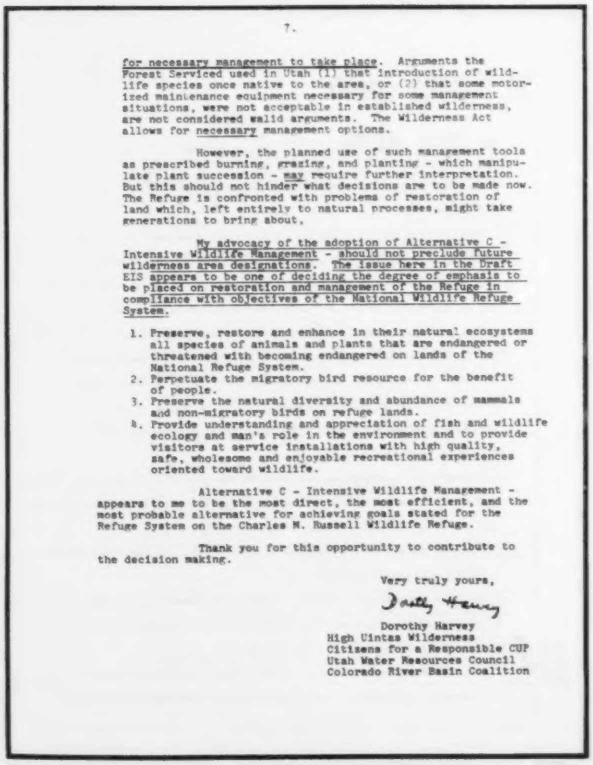
Possible use of volunteer help can include: development of, construction of, and maintenance of educational and interpretive functions: wilderness use and trail maintenance and monitoring: restoration of historical features; tree planting; installation of fences; construction of camp facilities, trail signs, and other interpretive options.

An adjunct to complete volunteer help might be payment for gasolene en route to Refuge and back and opportunity to spend a summer on the Refuge. Although the Park Service summer help were paid, and not all were retired, many regarded the summer job as a vacation opportunity. They were not subject to time limitations for staying at campsites.

There are several justifications for proceding this way. With the number of specialists required now for better management of public lands, and increased costs, the era of federal funding to cover such costs may not survive. With the degree of interest by the public in their opportunities to use public lands for their enjoyment, the involvement of this public in the management problems and solutions of these may be imminent. (I don't mean just in commenting on Land Use Planning.) With the numbers of retired people in good health and usefulness, this usefulness needs to be developed. With the various efforts to serve the nation's growing youth, opportunities for their involvement are wide open.

Designation of Refuge Areas for Wilderness

Consideration of wilderness options does not appear in the Draft EIS. Since criteria for wilderness may be in conflict with some management planning, that planning which might compromise wilderness classification ought to be avoided. Howeveb, while road contruction is the primary conflict, the Wilderness Act does allow, and is so interpreted, 4



for necessary management to take place. Arguments the Forest Serviced used in Utah (1) that introduction of wildlife species once native to the area, or (2) that some motorized maintenance equipment necessary for some management situations, were not acceptable in established wilderness, are not considered valid arguments. The Wilderness Act allows for necessary management options.

However, the planned use of such management tools as prescribed burning, grazing, and planting - which manipulate plant succession - may require further interpretation. But this should not hinder what decisions are to be made now. The Refuge is confronted with problems of restoration of land which, left entirely to natural processes, might take generations to bring about,

My advocacy of the adoption of Alternative C - Intensive Wildlife Management - should not preclude future wilderness area designations. The issue here in the Draft EIS appears to be one of deciding the degree of emphasis to be placed on restoration and management of the Refuge in compliance with objectives of the National Wildlife Refuge System.

1. Preserve, restore and enhance in their natural ecosystems all species of animals and plants that are endangered or threatened with becoming endangered on lands of the National Refuge System.
2. Perpetuate the migratory bird resource for the benefit of people.
3. Preserve the natural diversity and abundance of mammals and non-migratory birds on refuge lands.
4. Provide understanding and appreciation of fish and wildlife ecology and man's role in the environment and to provide visitors at service installations with high quality, safe, wholesome and enjoyable recreational experiences oriented toward wildlife.

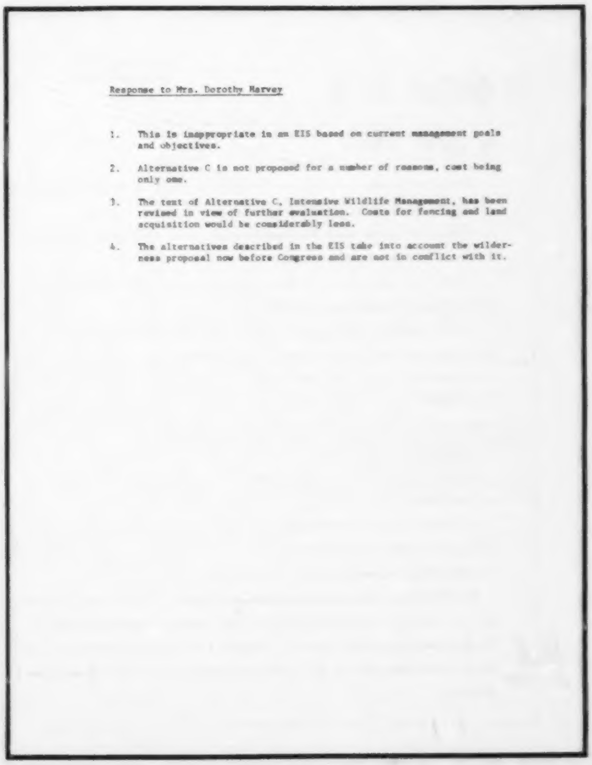
Alternative C - Intensive Wildlife Management - appears to me to be the most direct, the most efficient, and the most probable alternative for achieving goals stated for the Refuge System on the Charles M. Russell Wildlife Refuge.

Thank you for this opportunity to contribute to the decision making.

Very truly yours,

Dorothy Harvey

Dorothy Harvey
High Uintas Wilderness
Citizens for a Responsible CUP
Utah Water Resources Council
Colorado River Basin Coalition



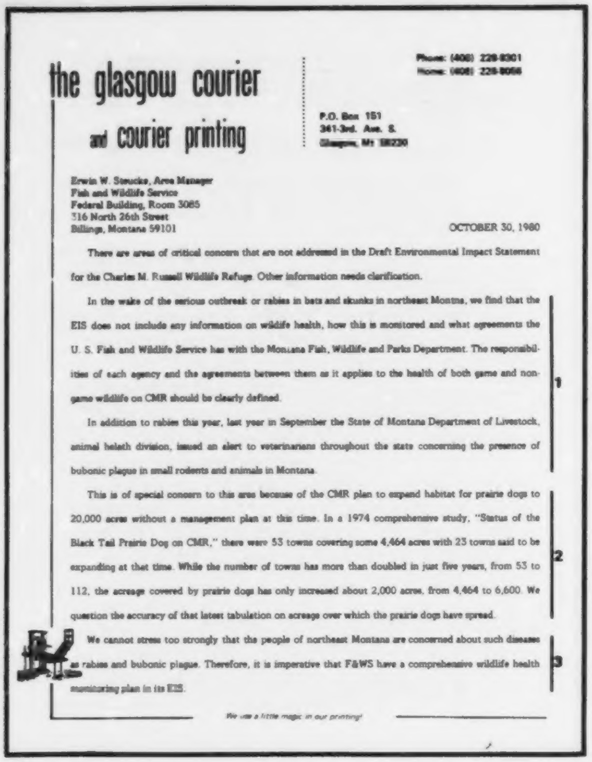
Response to Mrs. Dorothy Harvey

1. This is inappropriate in an EIS based on current management goals and objectives.

2. Alternative C is not proposed for a number of reasons, cost being only one.

3. The text of Alternative C, Intensive Wildlife Management, has been revised in view of further evaluation. Costs for fencing and land acquisition would be considerably less.

4. The alternatives described in the EIS take into account the wilderness proposal now before Congress and are not in conflict with it.



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Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3085
316 North 26th Street
Billings, Montana 59101

OCTOBER 30, 1980

There are areas of critical concern that are not addressed in the Draft Environmental Impact Statement for the Charles M. Russell Wildlife Refuge. Other information needs clarification.

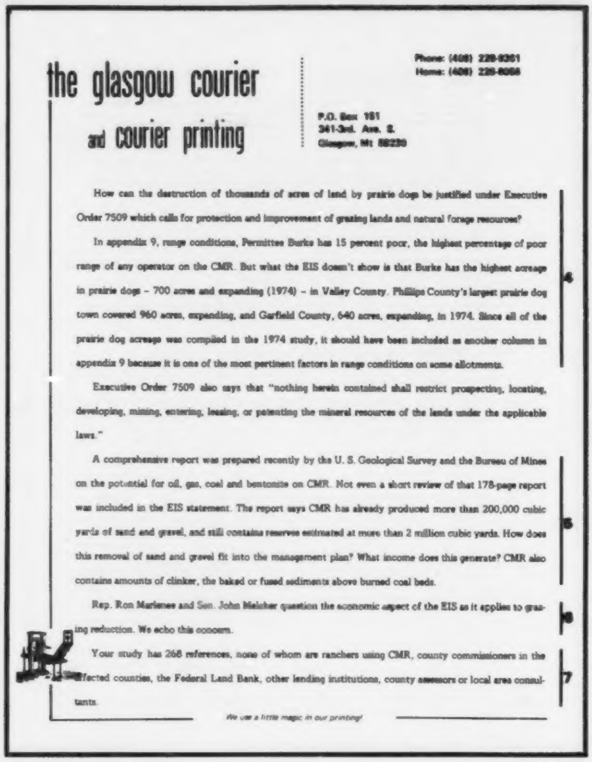
In the wake of the serious outbreak or rabies in bats and skunks in northeast Montna, we find that the EIS does not include any information on wildife health, how this is monitored and what agreements the U. S. Fish and Wildlife Service has with the Montana Fish, Wildlife and Parks Department. The responsibilities of each agency and the agreements between them as it applies to the health of both game and non-game wildlife on CMR should be clearly defined. 1

In addition to rabies this year, last year in September the State of Montana Department of Livestock, animal helath division, issued an alert to veterinarians throughout the state concerning the presence of bubonic plague in small rodents and animals in Montana.

This is of special concern to this area because of the CMR plan to expand habitat for prairie dogs to 20,000 acres without a management plan at this time. In a 1974 comprehensive study, "Status of the Black Tail Prairie Dog on CMR," there were 53 towns covering some 4,464 acres with 23 towns said to be expanding at that time. While the number of towns has more than doubled in just five years, from 53 to 112, the acreage covered by prairie dogs has only increased about 2,000 acres, from 4,464 to 6,600. We question the accuracy of that latest tabulation on acreage over which the prairie dogs have spread. 2

We cannot stress too strongly that the people of northeast Montana are concerned about such diseases as rabies and bubonic plague. Therefore, it is imperative that F&WS have a comprehensive wildlife health monitoring plan in its EIS. 3

We use a little magic in our printing!



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How can the destruction of thousands of acres of land by prairie dogs be justified under Executive Order 7509 which calls for protection and improvement of grazing lands and natural forage resources?

In appendix 9, range conditions, Permittee Burke has 15 percent poor, the highest percentage of poor range of any operator on the CMR. But what the EIS doesn't show is that Burke has the highest acreage in prairie dogs – 700 acres and expanding (1974) – in Valley County. Phillips County's largest prairie dog town covered 960 acres, expanding, and Garfield County, 640 acres, expanding, in 1974. Since all of the prairie dog acreage was compiled in the 1974 study, it should have been included as another column in appendix 9 because it is one of the most pertinent factors in range conditions on some allotments. 4

Executive Order 7509 also says that "nothing herein contained shall restrict prospecting, locating, developing, mining, entering, leasing, or patenting the mineral resources of the lands under the applicable laws."

A comprehensive report was prepared recently by the U. S. Geological Survey and the Bureau of Mines on the potential for oil, gas, coal and bentonite on CMR. Not even a short review of that 178-page report was included in the EIS statement. The report says CMR has already produced more than 200,000 cubic yards of sand and gravel, and still contains reserves estimated at more than 2 million cubic yards. How does this removal of sand and gravel fit into the management plan? What income does this generate? CMR also contains amounts of clinker, the baked or fused sediments above burned coal beds. 5

Rep. Ron Marlenee and Sen. John Melcher question the economic aspect of the EIS as it applies to grazing reduction. We echo this concern. 6

Your study has 268 references, none of whom are ranchers using CMR, county commissioners in the affected counties, the Federal Land Bank, other lending institutions, county assessors or local area consultants. 7

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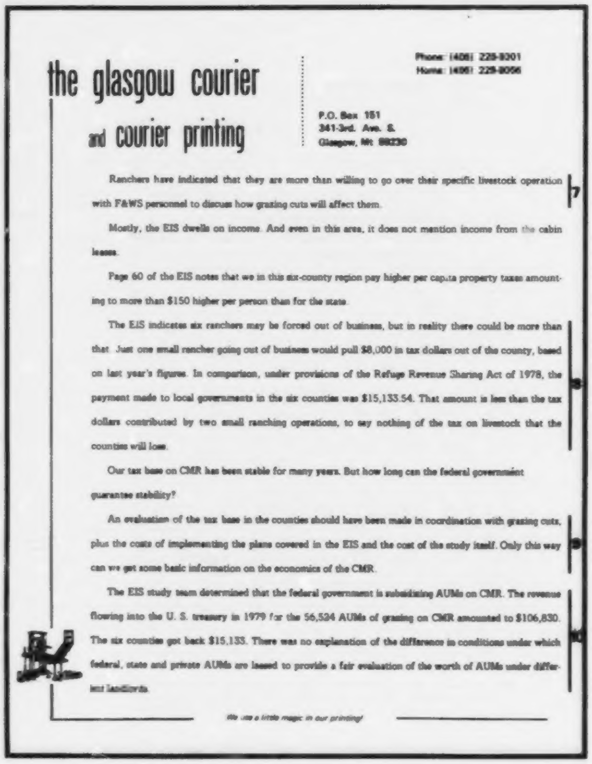

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Ranchers have indicated that they are more than willing to go over their specific livestock operation with F&WS personnel to discuss how grazing cuts will affect them. 7

Mostly, the EIS dwells on income. And even in this area, it does not mention income from the cabin leases.

Page 60 of the EIS notes that we in this six-county region pay higher per capita property taxes amounting to more than $150 higher per person than for the state.

The EIS indicates six ranchers may be forced out of business, but in reality there could be more than that. Just one small rancher going out of business would pull $8,000 in tax dollars out of the county, based on last year's figures. In comparison, under provisions of the Refuge Revenue Sharing Act of 1978, the payment made to local governments in the six counties was $15,133.54. That amount is less than the tax dollars contributed by two small ranching operations, to say nothing of the tax on livestock that the counties will lose. 8

Our tax base on CMR has been stable for many years. But how long can the federal government guarantee stability?

An evaluation of the tax base in the counties should have been made in coordination with grazing cuts, plus the costs of implementing the plans covered in the EIS and the cost of the study itself. Only this way can we get some basic information on the economics of the CMR. 9

The EIS study team determined that the federal government is subsidizing AUMs on CMR. The revenue flowing into the U. S. treasury in 1979 for the 56,524 AUMs of grazing on CMR amounted to $106,830. The six counties got back $15,133. There was no explanation of the difference in conditions under which federal, state and private AUMs are leased to provide a fair evaluation of the worth of AUMs under different landlords. 10

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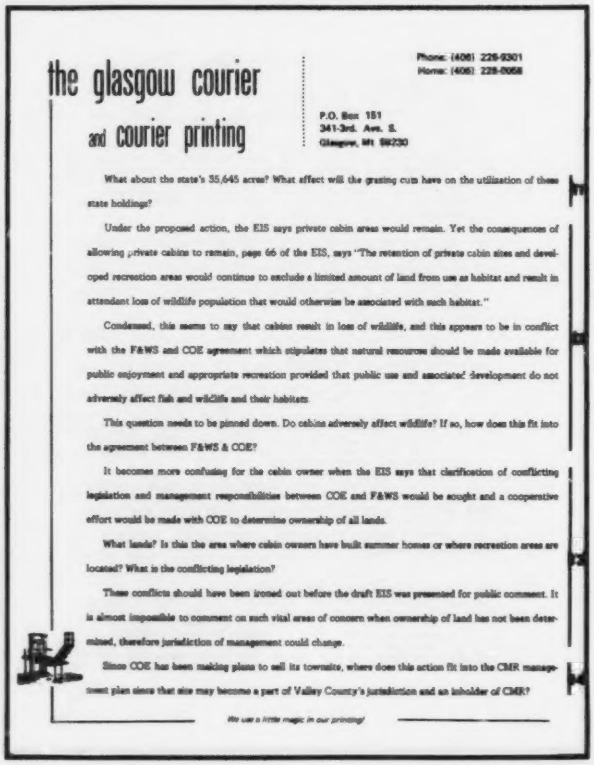

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What about the state's 35,645 acres? What affect will the grazing cuts have on the utilization of these state holdings? 11

Under the proposed action, the EIS says private cabin areas would remain. Yet the consequences of allowing private cabins to remain, page 66 of the EIS, says "The retention of private cabin sites and developed recreation areas would continue to exclude a limited amount of land from use as habitat and result in attendant loss of wildlife population that would otherwise be associated with such habitat."

Condensed, this seems to say that cabins result in loss of wildlife, and this appears to be in conflict with the F&WS and COE agreement which stipulates that natural resources should be made available for public enjoyment and appropriate recreation provided that public use and associated development do not adversely affect fish and wildlife and their habitats. [illegible]

This question needs to be pinned down. Do cabins adversely affect wildlife? If so, how does this fit into the agreement between F&WS & COE?

It becomes more confusing for the cabin owner when the EIS says that clarification of conflicting legislation and management responsibilities between COE and F&WS would be sought and a cooperative effort would be made with COE to determine ownership of all lands.

What lands? Is this the area where cabin owners have built summer homes or where recreation areas are located? What is the conflicting legislation? [illegible]

These conflicts should have been ironed out before the draft EIS was presented for public comment. It is almost impossible to comment on such vital areas of concern when ownership of land has not been determined, therefore jurisdiction of management could change.

Since COE has been making plans to sell its townsite, where does this action fit into the CMR management plan since that site may become a part of Valley County's jurisdiction and an inholder of CMR? [illegible]

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It's somewhat disturbing that CMR's number one goal is to attain and perpetuate a balanced, natural diversity of plant and animal communities favoring endangered or threatened species, then all other native species and finally desirable exotics.

It's a far cry from Executive Order 7509 establishing the game range that called for forage resources to be first utilized for sharp-tailed grouse and antelope, nonpredatory species and livestock. Coyotes and swift foxes do not seem to fit into President Roosevelt's vision when he signed the executive order.

It's obvious by now that Executive Order 7509 has been nullified. This is why we find it baffling that the executive order is included in the EIS while the documents which have brought about the changes that affect our lives today are not quoted at all. 15

The EIS mentions that the Pallid Sturgeon has been spotted and tagged as a threatened species. What exactly will that mean to fishermen? Restricted fishing areas? Where? 16

Hunters also have their complaints. More and more roads have been closed off, making it more difficult to retrieve game. The EIS statement does say that "improving roads would provide better access for fishermen, hunters and other recreationists . . . proper planning of road systems on the refuge would serve to minimize potentially detrimental impacts to wildlife." But does that really mean there will be more roads or less roads for hunters? 17

F&WS does provide maps showing routes open to motorized travel, according to its news release on the opening of the hunting season. Why wasn't this map included in the EIS or at least included in the recreation map, figure 1?

We feel that the EIS does not adequately address any of the real concerns of the people who live in this area.

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Although we cannot at this time recommend one plan over another because we do not have all the pieces of the puzzle, it has been the multiple use concept that most adequately fulfills the needs of the largest number of people.

Sincerely,

Ron Helland

Ron Helland, Publisher
Glasgow Courier

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Response to Mr. Ron Helland

1. According to the Montana Department of Livestock, Animal Health Division, rabies is endemic in Montana. Both skunks and bats are vectors; however, the significance of rabies in bats is not understood. Coyotes, raccoons, and foxes are not rabies vectors in Montana. Bubonic plague does occur in rodents and furbearers in Montana at very low levels. Cases of bubonic plague are extremely rare in humans, and no confirmed cases have been reported in Montana. The effects of the Proposed Action should have no significant influence on the incidence of either disease, rabies, or bubonic plague. A comprehensive wildlife health monitoring plan is beyond the scope of the EIS.

2. Some of the dog towns in existence in the 1974 study have remained stable, declined in size, or have even been abandoned.

3. See response #1 above.

4. Executive Order 7509 gives priority to wildlife. Prairie dogs are wildlife. Prairie dogs generally take over ranges that have already been overused or abused.

5. No commercial removal of sand or gravel from the refuge is planned. Minor amounts will be removed for refuge use.

6. The economic portion of the text has been revised to reflect the reevaluation of economic data.

7. Sixteen public meetings were held before the release of the DEIS to obtain input from the locally interested and affected public. One direct result is the inclusion of the Multiple Use alternative. To reference any or all of the attendees at these meetings would add little to the EIS.

8. The entire $8,000 of taxes that is claimed to be lost if one rancher goes out of business is unlikely to be correct. Even if this is the amount of taxes paid by the rancher, some taxes would be received by the county from the land, buildings, etc., in its new use. Thus the county will only lose the difference in taxes between current use and future use. It is possible that these future uses (second home development, etc.) might increase the taxes reserved. Regardless, it is the new level of each under Proposed Action that is to be considered in the EIS.

9. The economic costs of the plans covered in the EIS is presented in Appendix Table 13c on page 211. The costs of preparing the EIS is a joint cost which cannot be allocated to any one plan.

10. The subsidy results not from a flow of federal funds ($106,830 out and $15,133 back), but from a resource subsidy to ranchers who receive a AUMs worth substantially more than $1.89 to them for $1.89. It is this difference that generates the subsidy.

11. The grazing cuts will have no effect on the utilization of state holdings. The state sets the number of AUMs and FWS honors that number.

12. You are correct that cabins and cabin sites do reduce wildlife habitat. However, these sites and leases were established prior to the Memorandum of Agreement between the COE and FWS, and therefore, the FWS will not recommend their elimination.

13. There are areas of government land where management responsibilities are not clear; the FWS and COE will work together to determine respective management authorities on these lands.

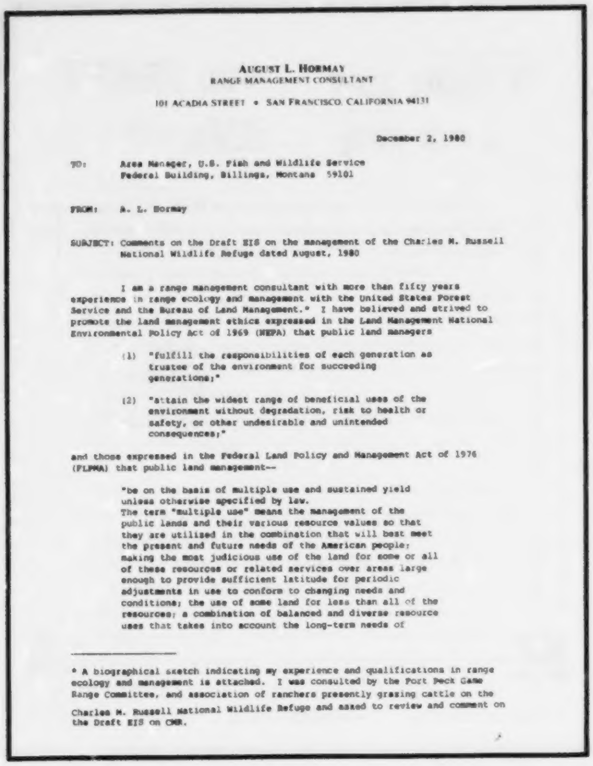
14. The COE has discussed the disposal of the Fort Peck townsite with the FWS. The FWS does not object to the selling of the townsite. FWS will cooperate with COE and Valley County to work out administrative details if the proposal is implemented.

15. All legislation and executive orders affecting the use of the refuge have been cited in the EIS.

16. There would be no restrictions because of this designation. See revised text.

17. Several hundred miles of designated roads exist on the refuge. Those suitable for continued use will remain open, while those susceptible to landslides, washouts, and wildlife conflicts may be abandoned or changed. Essentially, the road pattern will remain the same.

    The map is available for distribution to the public at the Lewistown, Slippery Ann, Jordan, and Fort Peck headquarters. That level of detail is beyond the scope of an EIS.



AUGUST L. HORMAY
RANGE MANAGEMENT CONSULTANT

101 ACADIA STREET • SAN FRANCISCO, CALIFORNIA 94131

December 2, 1980

TO: Area Manager, U.S. Fish and Wildlife Service
Federal Building, Billings, Montana 59101

FROM: A. L. Hormay

SUBJECT: Comments on the Draft EIS on the management of the Charles M. Russell National Wildlife Refuge dated August, 1980

I am a range management consultant with more than fifty years experience in range ecology and management with the United States Forest Service and the Bureau of Land Management.* I have believed and strived to promote the land management ethics expressed in the Land Management National Environmental Policy Act of 1969 (NEPA) that public land managers

(1) "fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;"

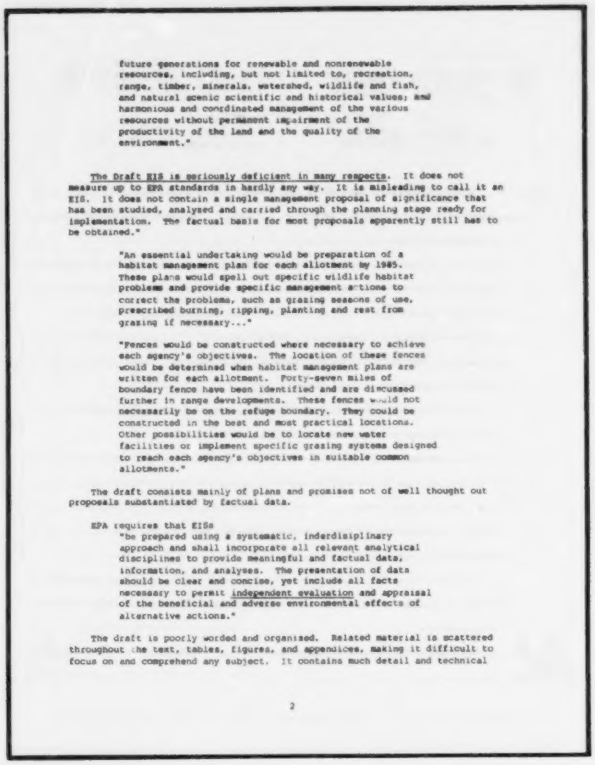
(2) "attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences;"

and those expressed in the Federal Land Policy and Management Act of 1976 (FLPMA) that public land management--

> "be on the basis of multiple use and sustained yield unless otherwise specified by law.
> The term "multiple use" means the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; the use of some land for less than all of the resources; a combination of balanced and diverse resource uses that takes into account the long-term needs of

---

* A biographical sketch indicating my experience and qualifications in range ecology and management is attached. I was consulted by the Fort Peck Game Range Committee, and association of ranchers presently grazing cattle on the Charles M. Russell National Wildlife Refuge and asked to review and comment on the Draft EIS on CMR.



> future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic scientific and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment."

The Draft EIS is seriously deficient in many respects. It does not measure up to EPA standards in hardly any way. It is misleading to call it an EIS. It does not contain a single management proposal of significance that has been studied, analysed and carried through the planning stage ready for implementation. The factual basis for most proposals apparently still has to be obtained."

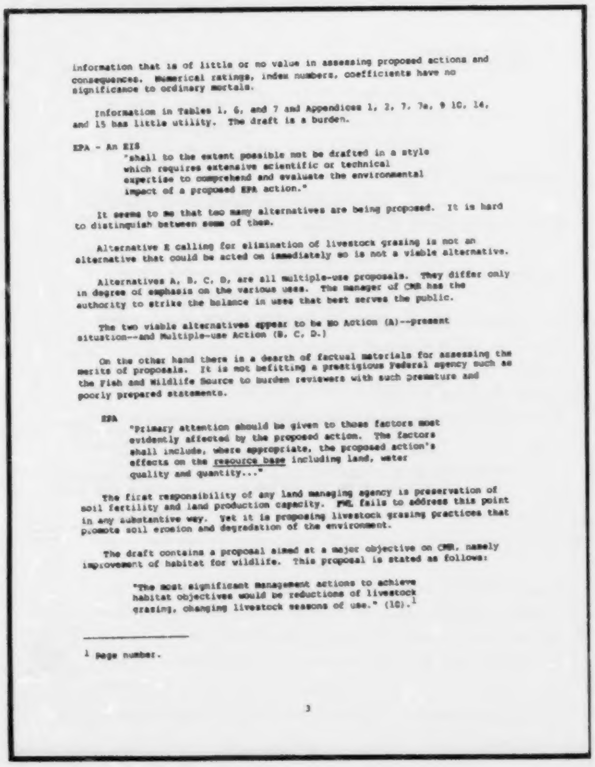
> "An essential undertaking would be preparation of a habitat management plan for each allotment by 1985. These plans would spell out specific wildlife habitat problems and provide specific management actions to correct the problems, such as grazing seasons of use, prescribed burning, ripping, planting and rest from grazing if necessary..."

> "Fences would be constructed where necessary to achieve each agency's objectives. The location of these fences would be determined when habitat management plans are written for each allotment. Forty-seven miles of boundary fence have been identified and are discussed further in range developments. These fences would not necessarily be on the refuge boundary. They could be constructed in the best and most practical locations. Other possibilities would be to locate new water facilities or implement specific grazing systems designed to reach each agency's objectives in suitable common allotments."

The draft consists mainly of plans and promises not of well thought out proposals substantiated by factual data.

EPA requires that EISs
> "be prepared using a systematic, inderdisiplinary approach and shall incorporate all relevant analytical disciplines to provide meaningful and factual data, information, and analyses. The presentation of data should be clear and concise, yet include all facts necessary to permit independent evaluation and appraisal of the beneficial and adverse environmental effects of alternative actions."

The draft is poorly worded and organized. Related material is scattered throughout the text, tables, figures, and appendices, making it difficult to focus on and comprehend any subject. It contains much detail and technical



information that is of little or no value in assessing proposed actions and consequences. Numerical ratings, index numbers, coefficients have no significance to ordinary mortals.

Information in Tables 1, 6, and 7 and Appendices 1, 2, 7, 7a, 9 10, 14, and 15 has little utility. The draft is a burden.

EPA - An EIS
> "shall to the extent possible not be drafted in a style which requires extensive scientific or technical expertise to comprehend and evaluate the environmental impact of a proposed EPA action."

It seems to me that too many alternatives are being proposed. It is hard to distinguish between some of them.

Alternative E calling for elimination of livestock grazing is not an alternative that could be acted on immediately so is not a viable alternative.

Alternatives A, B, C, D, are all multiple-use proposals. They differ only in degree of emphasis on the various uses. The manager of CMR has the authority to strike the balance in uses that best serves the public.

The two viable alternatives appear to be No Action (A)--present situation--and Multiple-use Action (B, C, D.)

On the other hand there is a dearth of factual materials for assessing the merits of proposals. It is not befitting a prestigious Federal agency such as the Fish and Wildlife Source to burden reviewers with such premature and poorly prepared statements.

EPA
> "Primary attention should be given to those factors most evidently affected by the proposed action. The factors shall include, where appropriate, the proposed action's effects on the resource base including land, water quality and quantity..."

The first responsibility of any land managing agency is preservation of soil fertility and land production capacity. FWL fails to address this point in any substantive way. Yet it is proposing livestock grazing practices that promote soil erosion and degradation of the environment.

The draft contains a proposal aimed at a major objective on CMR, namely improvement of habitat for wildlife. This proposal is stated as follows:

> "The most significant management actions to achieve habitat objectives would be reductions of livestock grazing, changing livestock seasons of use." (10).[1]

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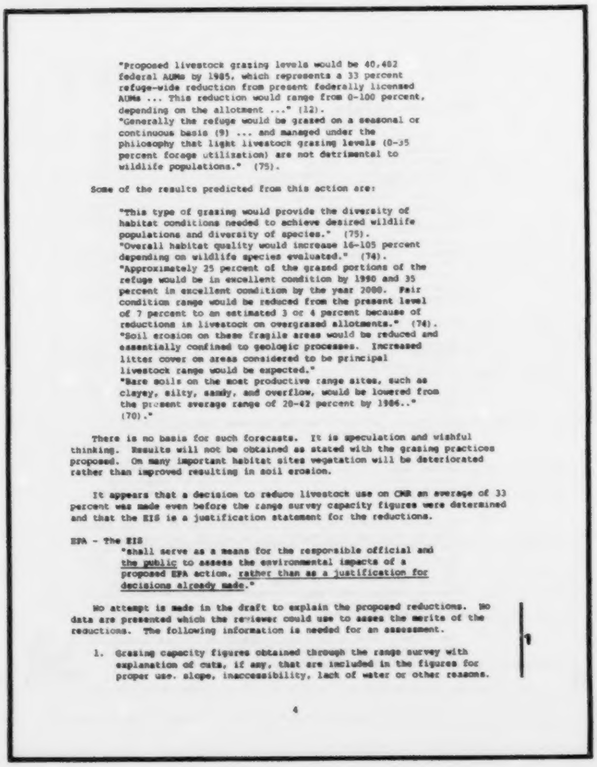
[1] Page number.



> "Proposed livestock grazing levels would be 40,482 federal AUMs by 1985, which represents a 33 percent refuge-wide reduction from present federally licensed AUMs ... This reduction would range from 0-100 percent, depending on the allotment ..." (12).
> "Generally the refuge would be grazed on a seasonal or continuous basis (9) ... and managed under the philosophy that light livestock grazing levels (0-35 percent forage utilization) are not detrimental to wildlife populations." (75).

Some of the results predicted from this action are:

> "This type of grazing would provide the diversity of habitat conditions needed to achieve desired wildlife populations and diversity of species." (75).
> "Overall habitat quality would increase 16-105 percent depending on wildlife species evaluated." (74).
> "Approximately 25 percent of the grazed portions of the refuge would be in excellent condition by 1990 and 35 percent in excellent condition by the year 2000. Fair condition range would be reduced from the present level of 7 percent to an estimated 3 or 4 percent because of reductions in livestock on overgrazed allotments." (74).
> "Soil erosion on these fragile areas would be reduced and essentially confined to geologic processes. Increased litter cover on areas considered to be principal livestock range would be expected."
> "Bare soils on the most productive range sites, such as clayey, silty, sandy, and overflow, would be lowered from the present average range of 20-42 percent by 1986.." (70)."

There is no basis for such forecasts. It is speculation and wishful thinking. Results will not be obtained as stated with the grazing practices proposed. On many important habitat sites vegetation will be deteriorated rather than improved resulting in soil erosion.

It appears that a decision to reduce livestock use on CMR an average of 33 percent was made even before the range survey capacity figures were determined and that the EIS is a justification statement for the reductions.

EPA - The EIS
> "shall serve as a means for the responsible official and the public to assess the environmental impacts of a proposed EPA action, rather than as a justification for decisions already made."

No attempt is made in the draft to explain the proposed reductions. No data are presented which the reviewer could use to asses the merits of the reductions. The following information is needed for an assessment. 1

1. Grazing capacity figures obtained through the range survey with explanation of cuts, if any, that are included in the figures for proper use. slope, inaccessibility, lack of water or other reasons.

2. Base capacity figures used by FWL to arrive at proposed capacities with an explanation of cuts if any included in these figures. 1

Other information needed to get a better picture of conditions and background for management proposals on CMR are

Vegetation. Present description inadequate.
    List of the principal types
        For each type
            Acreage
            Map (letter size) showing location, distribution.
            Table Species composition and density.

Wildlife
    List of principal species
        For each species
            Estimated present population (numbers).
            Distribution map (letter size)
            Total habitat area (acres)
            Principal vegetation habitats in decreasing order of importance.

Grazing allotments (entirely or partly on CMR)
        Number
        Total acreage
            Portion off CMR (acres)
            Portion on CMR (acres)
                Land ownership and jurisdiction in each portion. 2

        On CMR
            Area excluded from grazing by fencing, farming, etc.
            Area not grazed because of slope, natural barrier, etc.
            Area not grazed because of lack of water.
            Area actually grazed (grazing area)
            Total number of livestock grazed
                cattle, sheep, horses and other

Vegetation use on 5 sites (average in past years)
1. In ravine and drainage bottoms.
2. Around water (ponds, troughs) and along streams to a distance of 1/4 mile from water.
3. Slopes up to 20 percent adjoining drainage courses between 1/4 and 1 mile from drainage.
4. Slopes greater than 20 percent adjoining drainage courses between 1/4 and 1 mile frofm drainage.
5. Table and benchlands to a distance of 1 mile from water.

Rate as none, light, moderate or heavy

The following information is needed on each allotment
Name
Name of permittee
Size
Area on CMR and Area of CMR
    Land ownership and jurisdiction (acres) on each

On CMR
        Acreage excluded from grazing (fenced etc.)
        Acreage not graseable (slope, natural barrier)
        Acreage not used (lack water)
        Acreage actually grazed = grazing area
Vegetation types
        Acres of each type (acres)
            On whole area in CMR
            On grazing area in CMR
        Soil erosion each type
            Acres geologic erosion
            Acres (none, light, moderate, heavy) accelerated erosion 2
Livestock grazing
    Livestock on CMR
        Number (AUs) Present, proposed
        Kind " "
    Grazing season (dates)

    Total AUMs
        Federal Present, proposed
        Private "

    Grazing system Present, proposed

The FWL has decided on light continuous grazing on CMR quite arbitrarily, justifying it with a superfical comparison of grazing systems reported in the literature. Comparisons of grazing systems can be made from information obtainable on CMR. Here light continuous grazing, deferred-rotation grazing and rest-rotation grazing are being practiced. Why hasn't such a comparison been made? If it has why aren't the results reported in the EIS. With rest-rotation grazing the vegetation can be improved and maintained and soil erosion controlled on all areas grazed by livestock on CMR. 3

A. L. Hormay

Response to Mr. August L. Hormay

1. The FWS computed AUMs from the inventory conducted by four contract range specialists in strict accordance with SCS stocking guides. The AUMs derived from this method were then subjected to a slope/water matrix to determine availability to livestock. From this process, the Service computed the amount of forage available to livestock found in the Proposed Action. See revised Appendix 15.

   More detailed information is beyond the scope of this document. The information is available for examination at the refuge headquarters in Lewistown, Montana.

2. Much of this information you have requested is available in the text. Please refer to the "Affected Environment" section, page 35-43 for information concerning geology, soils-water resources, and wildlife habitat-range resources. Appendix 5 (Federal stocking levels in AUMs under each management alternative (livestock), Appendix 9 (Range condition class breakdown by livestock operator and allotment), Appendix 10 (Summary of grazing permittee operations and impacts of implementing various alternatives), and Appendix 15 (Methodology employed in calculation of AUMs) address many of the points in your letter.

   Other information beyond the scope of this document is available for your inspection at the refuge headquarters, Lewistown, Montana.

3. The FWS has made three comparisons. However, an examination of HEP values (Appendix 2) for most wildlife species by allotment indicate that light, seasonal grazing is superior to other types of grazing management for wildlife on CMR. This formed the basis for the general grazing recommendations found in the Proposed Action. This information is available for examination at the refuge headquarters, Lewistown, Montana.

Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3085
316 North 26th Street
Billings, Montana 59101

Dear Sirs:

My main concern with the proposed management as stated in the CMR ES deals with water recreation. The Game Range surrounds the largest body of water in the state of Montana. The present and proposed management objectives in the ES seriously jepordize the the recreational use, which is by far the best use, by keeping it isolated due to lack of developed access sites to the lake.

The Proposed Alternative addresses only a boat access site at Fourchette Bay. I do not feel this is adequate. I would like to make a few suggestions for increased recreational usage of the lake.

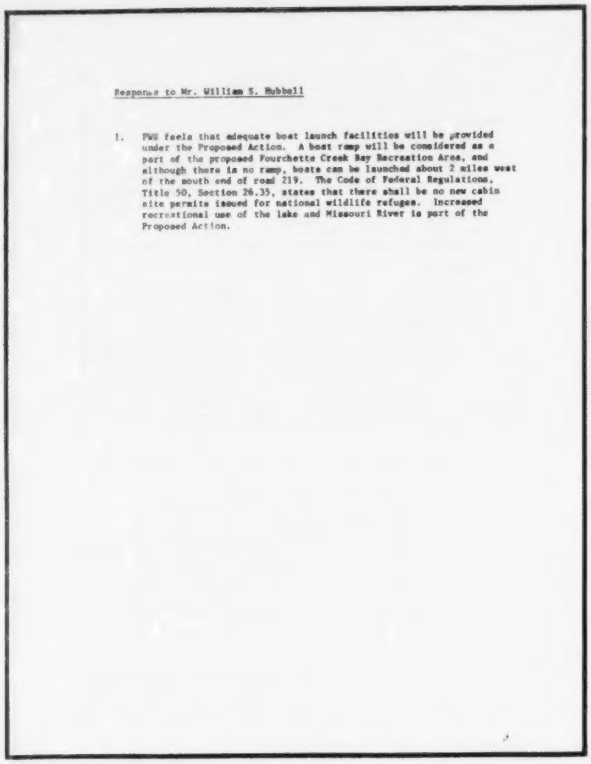
1. Boat ramps and recreational areas developed on the north side of the lake at the following sites:
   a. South end of road 219 — south of the UL Bend Headquarters.
   b. South end of road 425.
2. On each of the already developed and suggested sites, I would recommend that some acreage be set aside for cabin development. 1

I feel that recreational use of the lake should be increased in conjunction with CMR's wildlife objectives. What prevents the Fish and Wildlife service from increasing it's management to include management of water recreation as they can control it by limiting access?

Therefore, I would support the Proposed Alternative if it included increased recreational development. Barring the rewritting of the Proposed Alternative to reflect an increase in recreation management, I would feel forced to support the Multiple Use Alternative. I feel the ES and the analysis missed the boat in not exploring an alternative that recommended increased wildlife and recreational management.

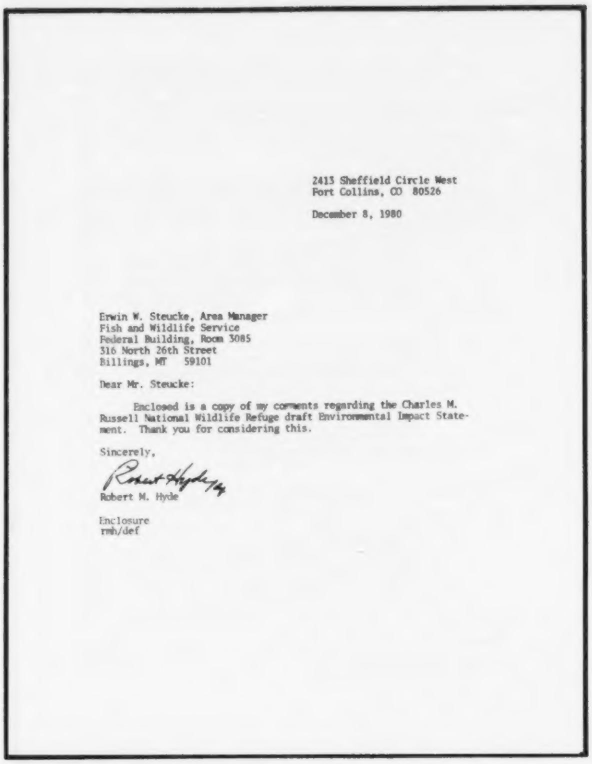
Thank you for allowing me this opportunity to comment.

Sincerely,
William S Hubbell
William S. Hubbell
Box 1044
Malta, Montana 59538



Response to Mr. William S. Hubbell

1. FWS feels that adequate boat launch facilities will be provided under the Proposed Action. A boat ramp will be considered as a part of the proposed Fourchette Creek Bay Recreation Area, and although there is no ramp, boats can be launched about 2 miles west of the south end of road 219. The Code of Federal Regulations, Title 50, Section 26.35, states that there shall be no new cabin site permits issued for national wildlife refuges. Increased recreational use of the lake and Missouri River is part of the Proposed Action.



2413 Sheffield Circle West
Fort Collins, CO 80526

December 8, 1980

Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3085
316 North 26th Street
Billings, MT 59101

Dear Mr. Steucke:

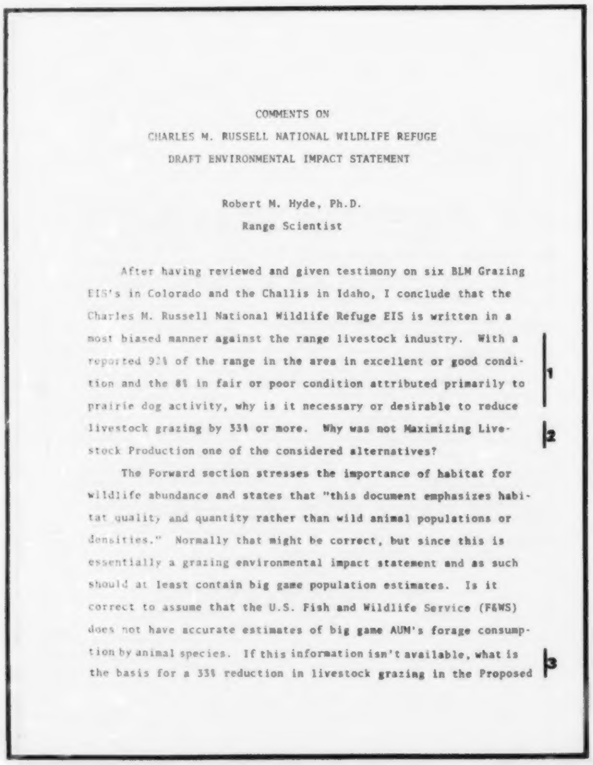
Enclosed is a copy of my comments regarding the Charles M. Russell National Wildlife Refuge draft Environmental Impact Statement. Thank you for considering this.

Sincerely,

Robert Hyde

Robert M. Hyde

Enclosure
rmh/def



COMMENTS ON
CHARLES M. RUSSELL NATIONAL WILDLIFE REFUGE
DRAFT ENVIRONMENTAL IMPACT STATEMENT

Robert M. Hyde, Ph.D.
Range Scientist

After having reviewed and given testimony on six BLM Grazing
EIS's in Colorado and the Challis in Idaho, I conclude that the
Charles M. Russell National Wildlife Refuge EIS is written in a
most biased manner against the range livestock industry. With a
reported 92% of the range in the area in excellent or good condi- 1
tion and the 8% in fair or poor condition attributed primarily to
prairie dog activity, why is it necessary or desirable to reduce
livestock grazing by 33% or more. Why was not Maximizing Live- 2
stock Production one of the considered alternatives?

The Forward section stresses the importance of habitat for
wildlife abundance and states that "this document emphasizes habi-
tat quality and quantity rather than wild animal populations or
densities." Normally that might be correct, but since this is
essentially a grazing environmental impact statement and as such
should at least contain big game population estimates. Is it
correct to assume that the U.S. Fish and Wildlife Service (F&WS)
does not have accurate estimates of big game AUM's forage consump-
tion by animal species. If this information isn't available, what is 3
the basis for a 33% reduction in livestock grazing in the Proposed

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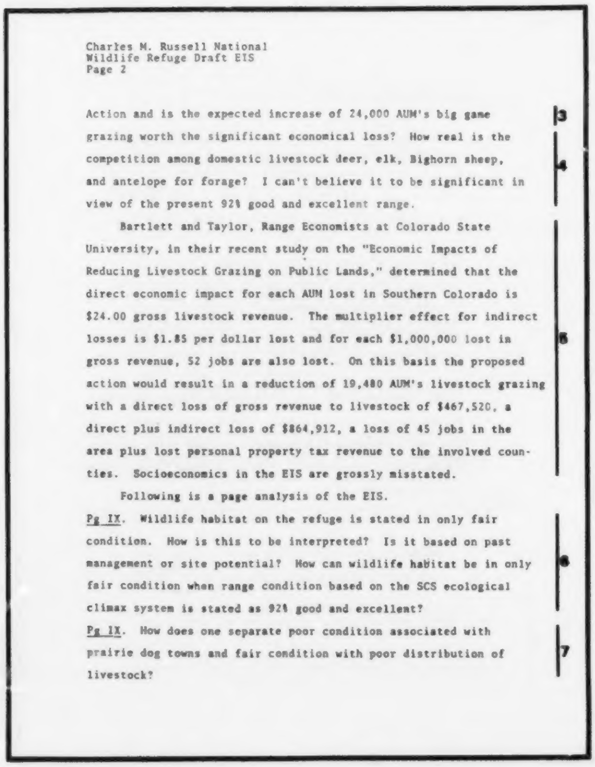


Action and is the expected increase of 24,000 AUM's big game 3
grazing worth the significant economical loss? How real is the
competition among domestic livestock deer, elk, Bighorn sheep, 4
and antelope for forage? I can't believe it to be significant in
view of the present 92% good and excellent range.

Bartlett and Taylor, Range Economists at Colorado State
University, in their recent study on the "Economic Impacts of
Reducing Livestock Grazing on Public Lands," determined that the
direct economic impact for each AUM lost in Southern Colorado is
$24.00 gross livestock revenue. The multiplier effect for indirect
losses is $1.85 per dollar lost and for each $1,000,000 lost in 5
gross revenue, 52 jobs are also lost. On this basis the proposed
action would result in a reduction of 19,480 AUM's livestock grazing
with a direct loss of gross revenue to livestock of $467,520, a
direct plus indirect loss of $864,912, a loss of 45 jobs in the
area plus lost personal property tax revenue to the involved coun-
ties. Socioeconomics in the EIS are grossly misstated.

Following is a page analysis of the EIS.

Pg IX. Wildlife habitat on the refuge is stated in only fair
condition. How is this to be interpreted? Is it based on past
management or site potential? How can wildlife habitat be in only 6
fair condition when range condition based on the SCS ecological
climax system is stated as 92% good and excellent?

Pg IX. How does one separate poor condition associated with
prairie dog towns and fair condition with poor distribution of 7
livestock?

Pg IX. The farming and ranching economic situation is currently
critical, but less than $10,000 income generated from 800 acres 8
of land farmed seems extreme!

Pg X. The U.S. Office of Management and Budget has become very
sensitive and demanding of agencies to demonstrate cost effective-
ness. Reintroductions of the species listed won't be cost effec- 9
tive and requests for appropriations for these activities may be
difficult to obtain.

Pg X. Soil ripping on Charles M. Russell National Wildlife Refuge (CMR) will probably do more harm than good, and shrub plantings are very expensive and almost sure to fail unless individually watered and protected.

Pg X. What is the basis of reducing livestock grazing by 33% when
almost all range is in good and excellent condition. How were
grazing capacities determined and on what basis is forage to be 10
allocated to livestock and big game?

Pg 1. The background information, current situation and conflicts
or past management problems among the agencies involved is not 11
addressed in sufficient detail.

Pg 1. I question the statement regarding the public's desire to
reduce or eliminate grazing on public land. Granted a few so-called
environmentalists would eliminate livestock, period: but the majority
of the U.S. public still desires red meat at a reasonable price. 12
This would not be possible without livestock grazing on public land.
Some who are quite uninformed scoff at the 14% contribution of
public lands grazing to the U.S. annual total, but we must remember

that most calves produced spend some time on public land. A 1974
report entitled, "Opportunities to Increase Red Meat Production
From Ranges of the United States" projects that demand will increase
from 213 million AUM's in 1974 to 426 AUM's by 2000. The Forest
Service Resource Planning Act Assessment (RPA) also supports this
increase. With 31 percent of the 835 million acres of forest and
rangeland grazed in the U.S. being under Federal ownership there is
no way this increase can be achieved without livestock grazing on 12
Federal or Public Lands. Who is the public that wants grazing re-
duced or eliminated? Is that what they really want or is that what
they think they want?

What are the desires of the residents of the six counties involved in CMR? They are the ones who suffer the economic loss and their wishes should carry more weight than someone who may never even visit the area.

Pg 3. If range is in good and excellent ecological condition, I
question whether or not habitat deficiencies can be corrected without
excessively expensive manipulations, even with zero livestock grazing. 13
What sampling data reveal that improving the habitat for sharptailed
grouse alone will correct habitat for 80% of all wildlife?

Pg 3. Is the 60,108 permitted AUM's the total for the resource area
or are AUM's on private and state lands in addition to the total? 14

Pg 4 #1. What are desirable exotics? I don't support favoring them on CMR. 15

Pg 4 #8. Too often throughout the EIS, #8 is lost sight of. It has long been demonstrated on CMR that livestock can graze at the presently permitted numbers (60,108 AUM's) without undue conflict, in fact harmoniously with wildlife and without a decline in range

condition or downward range trend. Why recommend changing a system that is working or at least can work?

Pg 5 Wildlife #2. I question the advisability of introducing six
black footed ferret pairs on six different locations. They are 16
rather solitary but success of reintroduction might be enhanced
by six pairs in three locations or less.

Pg 5 Range #1. Climax range is the highest level attainable on
any site. It cannot be improved without artificial manipulation.
Perhaps the writter meant to increase the percentage of good and
excellent condition range although 92% is very, very high under
any management for any kind or mix of large herbivores. Of all 17
the grazing EIS's I have read, here is one that the involved agency
could have pointed with justifiable pride at past management and
present condition. Why was the decision made to paint a bleak
picture and recommend a 33% livestock reduction?

Pg 6 #3. I can only hope the F&WS is sincere in the stated objective to "Provide stability and support to livestock users and their operations consistent with wildlife objectives." How can a 33% livestock reduction provide stability and support? Hogwash!

Pg 9. This page needs serious rewriting.

#2. How can anyone say that water developments are not consistent with wildlife goals? The return of vast pronghorn herds in Wyoming is rather directly attributed to range improvements primarily water developments. I strongly suspect the same is true in Montana and CMR.

#3. Soil ripping and shrub planting are a strong concern as mentioned earlier.

#4. What does this mean? Is F&WS qualified and authorized here?
Pg 9. Land title questions need to be resolved no matter what the 21
selected alternative or mix in the decision document.

Pg 9 last paragraph. There is no consideration given to the pos-
sibility that wildlife objectives might not be met because of exces-
sive wildlife numbers. This is just as much a possibility as is
too many livestock. Perhaps livestock numbers could be zero and
wildlife objectives still not met. With range condition 92% in
good and excellent I can conclude rather safely that past stocking
rates have been light. A 33% reduction in livestock AUM's is not 22
justified. Several rest rotation grazing schemes have reportedly
worked well in the CMR general area. Why not consider implementing
well designed R-R systems with permittee design input, without
reducing livestock AUM's? I assure you that in 5 to 15 years an
increase in livestock AUM's could be justified consistent with
reasonable wildlife objectives.

Pg 10. Why not fence on the refuge boundary? New water facilities
is inconsistent with #2 on page 9. Man doesn't quickly manipulate
"grazing capacities." Perhaps "stocking rate" or "grazing intensity" 23
would be more appropriate.

Does livestock grazing on a prescription basis lend any stability to the livestock operator? I think not.

Pg 11. Prescribed burning as recommended recently has become the
"in thing" and I think is being both misused and overused. I would 24
expect prescribed burning to result in a rapid release of rubber
rabbitbrush, one of our least desirable shrubs although reportedly

24 broused to a limited extent on CMR.

25 Pg 11. Shrubs probably were once more abundant as stated. Reportedly they were lost during the drought of the 30's. I doubt that any kind of management practice short of costly clone transplanting with a large modified front-end loader, such as used by Energy Fuels on mined land reclamation, would be successful on shrub reestablishment.

It is frequently implied that shrub decrease was the result of livestock grazing. This I can't accept. In fact deer browsing has probably been more detrimental to shrubs than have livestock.

26 Pg 11. Is fencing the answer for riparian zones? How much riparian use should be attributed to livestock and how much to game winter use? Much riparian zone close browsing attributed to livestock is in fact caused by big game. Fencing riparian zones probably would be of little benefit unless game proof.

27 Pg 11 #7. Planting native browse with no grasses for wildfire rehabilitation is not ecologically sound.

28 Pg 12. What is the basis for the proposed 33% reduction in livestock AUM's? Why were not the four range scientists who were eminently qualified who conducted the survey not allowed, in fact encouraged, to compute the AUM's grazing capacity? Who could have been better qualified than were those who rode and surveyed 776,000 acres of CMR to determine the AUM's grazing capacity? This was either a gross error or the desire of F&WS to manipulate to suit their wishes. If the latter is the case, no wonder the permittees are mistrusting of F&WS as you stated earlier.

29 Pg 13. Ripping up to as much as 10,000 acres scares me. Perhaps

29 contour pitting on selected sites could be recommended but I question the advisability of large scale ripping for CMR kind of soil and vegetation.

Pg 16. I don't like the term "no-grazing areas" that will be periodically or at least occasionally grazed.

Pg 16. As stated earlier, fencing riparian zones frequently will not bring about expected results.

30 Pg 19. What is the basis for 2 years' rest following one season of use? This isn't necessary where range condition is good and excellent, trend is stable or upward and use is no more than moderate such as occurs or is proposed for CMR. There is no reason to be so restrictive even when wildlife interests are strongly considered.

Pg 24. I question that there would be substantial range improvement over the next 20 years.

31 Pg 26. Why would not the Multiple Use or No Action alternatives provide a wildlife refuge situation? Is CRM not now a wildlife refuge operating essentially in the No Actional alternative sense?

Of the alternatives discussed I would strongly urge consideration of the Multiple Use Alternative. I would recommend that steps be initiated to insure whatever Congressional action necessary to make the Multiple Use alternative compatible.

Was Judge Flannery's decision in NRDC vs. Rodgers Morton et al. meant to result in reduced livestock grazing on good and excellent condition well managed range in a stable or upward trend? I hope not.

32 Pg 27. Socioeconomic comparisons are poorly done in the EIS. If the real value of an AUM is $24.00 the multiplier being $1.85/$1.00 and the job loss of 52/$1,000,000 lost revenue as determined by Bartlett and Taylor, why not use those figures to compute a meaningful socioeconomic comparison?

33 Pg 30. The Proposed Action reducing total AUM's of the region by 0.3% is misleading and probably incorrect. When ranching operations are no longer economically feasible as could be the case with some CMR permittees, the possibility of subdividing always is strong. Nothing is more detrimental to wildlife than are subdivisions and associated people activities. When the total AUM's lost from both deeded and public lands are computed, the total may well exceed 0.3%. Also how critical to season of use and forage availability is the 0.3% regional reduction in terms of the total ranching industry? In some situations the 0.3% could be magnified several times.

34 Pg 52. The reference to livestock spooking game is another example of bias against livestock grazing.

Pg 52. The last paragraph doesn't really say much.

35 Pg 57. How can 70 acres of grain and 450 acres of hay generate less than $10,000 of revenue? Why is 280 acres of dense nesting cover included as farmed?

36 Pg 60. It would be helpful to know what the numbers of people were who favored which alternative.

37 Pg 62. I can't agree with the next to the last paragraph, and it should not be included especially when it is admitted that no soil loss determinations were made. It is rather universally concluded that

soil loss is not critical on good and excellent condition range in an upward trend.

38 Pg 64. The last sentence is an overstated generalization and should be omitted.

Pg 67. I read earlier that the deteriorated range on CMR was attributed to prairie dog activity not over allocation of forage to livestock. Prairie dogs and deteriorated range means wanting one necessitates accepting the other, but please don't state that "present forage allocations would provide for undesirable aesthetic qualities..."

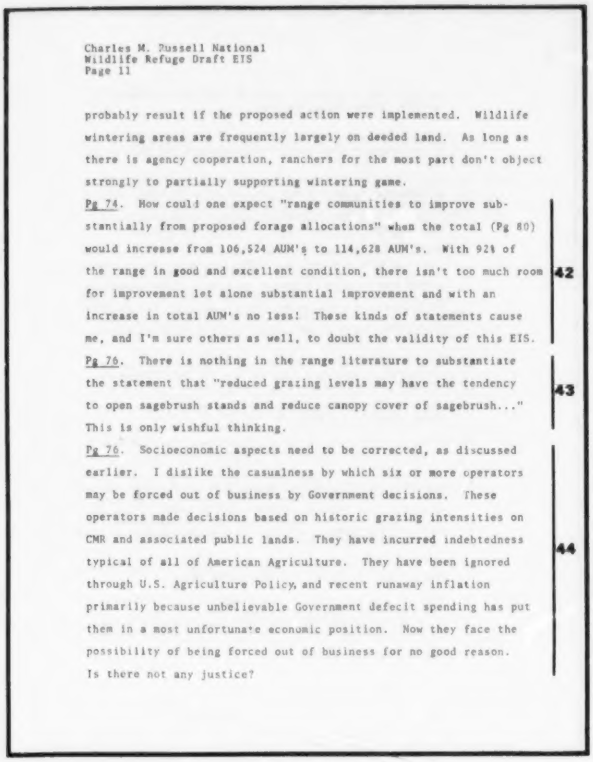
39 Pg 69. I question the presence of sufficient precision to estimate a 2% increase in excellent condition, a 5% decrease in good condition, etc. Even if the precision were available what is the logic in projecting some increase in excellent condition and a decrease in good range condition?

40 Pg 70. How is ripping 10 to 18" going to eliminate perched water tables? Ripping probably should be scratched in favor of some consideration of very selective and limited contour pitting on heavy textured soils.

Pg 71. I would think F&WS would be obligated to control prairie dog activity outside the CMR.

41 Pg 71. My experience with Bighorn sheep is that competition with livestock for forage is essentially nonexistent because of differences in habitat preference.

Pg 74. Last sentence second paragraph is very important. There is no way F&WS can expect good cooperation from permittees when they are forced to increase grazing intensity on deeded land as would



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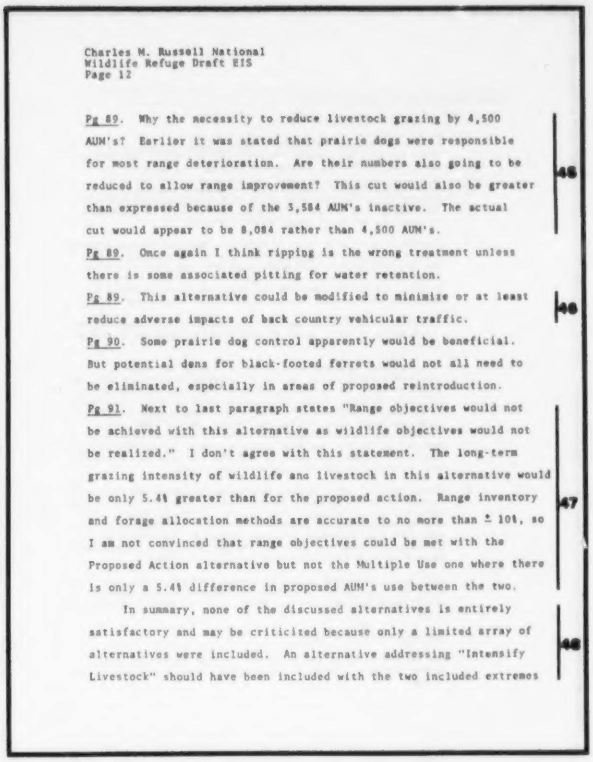
probably result if the proposed action were implemented. Wildlife wintering areas are frequently largely on deeded land. As long as there is agency cooperation, ranchers for the most part don't object strongly to partially supporting wintering game.

Pg 74. How could one expect "range communities to improve substantially from proposed forage allocations" when the total (Pg 80) would increase from 106,524 AUM's to 114,628 AUM's. With 92% of the range in good and excellent condition, there isn't too much room for improvement let alone substantial improvement and with an increase in total AUM's no less! These kinds of statements cause me, and I'm sure others as well, to doubt the validity of this EIS. 42

Pg 76. There is nothing in the range literature to substantiate the statement that "reduced grazing levels may have the tendency to open sagebrush stands and reduce canopy cover of sagebrush..." This is only wishful thinking. 43

Pg 76. Socioeconomic aspects need to be corrected, as discussed earlier. I dislike the casualness by which six or more operators may be forced out of business by Government decisions. These operators made decisions based on historic grazing intensities on CMR and associated public lands. They have incurred indebtedness typical of all of American Agriculture. They have been ignored through U.S. Agriculture Policy, and recent runaway inflation primarily because unbelievable Government deficit spending has put them in a most unfortunate economic position. Now they face the possibility of being forced out of business for no good reason. Is there not any justice? 44



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Pg 89. Why the necessity to reduce livestock grazing by 4,500 AUM's? Earlier it was stated that prairie dogs were responsible for most range deterioration. Are their numbers also going to be reduced to allow range improvement? This cut would also be greater than expressed because of the 3,584 AUM's inactive. The actual cut would appear to be 8,084 rather than 4,500 AUM's. 45

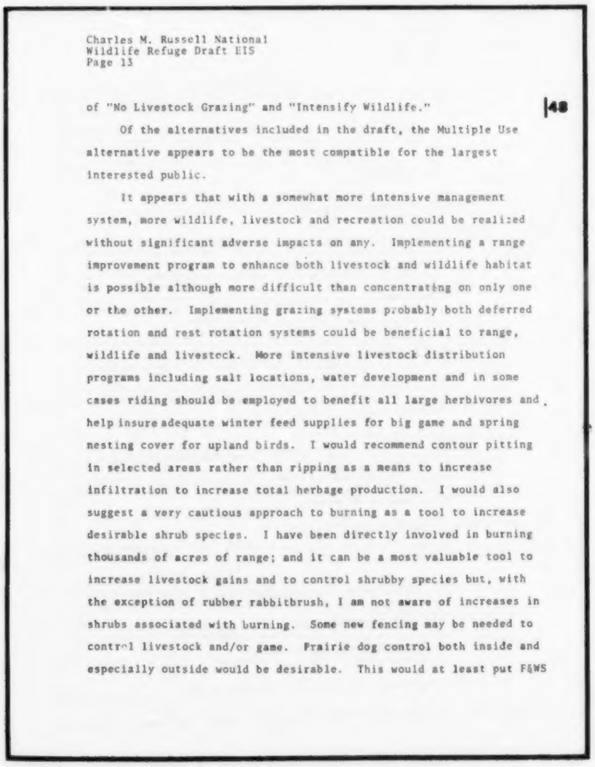
Pg 89. Once again I think ripping is the wrong treatment unless there is some associated pitting for water retention.

Pg 89. This alternative could be modified to minimize or at least reduce adverse impacts of back country vehicular traffic. 46

Pg 90. Some prairie dog control apparently would be beneficial. But potential dens for black-footed ferrets would not all need to be eliminated, especially in areas of proposed reintroduction.

Pg 91. Next to last paragraph states "Range objectives would not be achieved with this alternative as wildlife objectives would not be realized." I don't agree with this statement. The long-term grazing intensity of wildlife and livestock in this alternative would be only 5.4% greater than for the proposed action. Range inventory and forage allocation methods are accurate to no more than ± 10%, so I am not convinced that range objectives could be met with the Proposed Action alternative but not the Multiple Use one where there is only a 5.4% difference in proposed AUM's use between the two. 47

In summary, none of the discussed alternatives is entirely satisfactory and may be criticized because only a limited array of alternatives were included. An alternative addressing "Intensify Livestock" should have been included with the two included extremes 48



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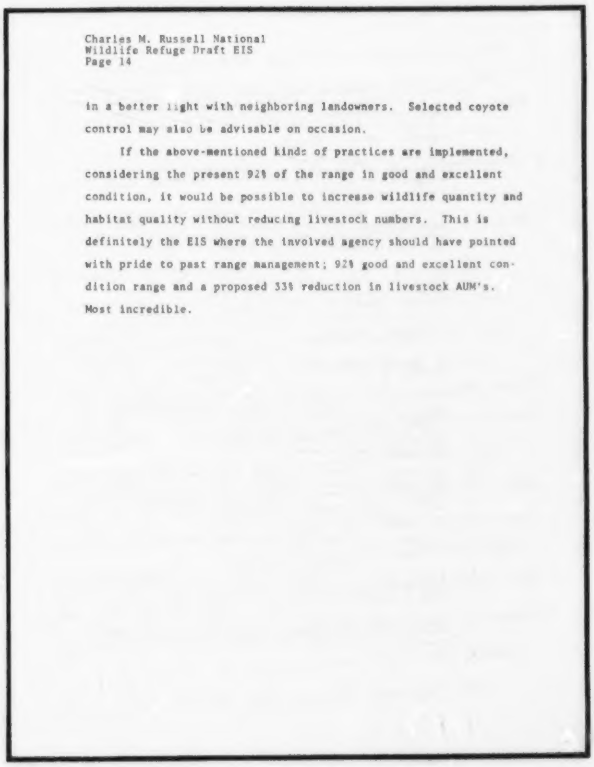
of "No Livestock Grazing" and "Intensify Wildlife." 48

Of the alternatives included in the draft, the Multiple Use alternative appears to be the most compatible for the largest interested public.

It appears that with a somewhat more intensive management system, more wildlife, livestock and recreation could be realized without significant adverse impacts on any. Implementing a range improvement program to enhance both livestock and wildlife habitat is possible although more difficult than concentrating on only one or the other. Implementing grazing systems probably both deferred rotation and rest rotation systems could be beneficial to range, wildlife and livestock. More intensive livestock distribution programs including salt locations, water development and in some cases riding should be employed to benefit all large herbivores and help insure adequate winter feed supplies for big game and spring nesting cover for upland birds. I would recommend contour pitting in selected areas rather than ripping as a means to increase infiltration to increase total herbage production. I would also suggest a very cautious approach to burning as a tool to increase desirable shrub species. I have been directly involved in burning thousands of acres of range; and it can be a most valuable tool to increase livestock gains and to control shrubby species but, with the exception of rubber rabbitbrush, I am not aware of increases in shrubs associated with burning. Some new fencing may be needed to control livestock and/or game. Prairie dog control both inside and especially outside would be desirable. This would at least put F&WS



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in a better light with neighboring landowners. Selected coyote control may also be advisable on occasion.

If the above-mentioned kinds of practices are implemented, considering the present 92% of the range in good and excellent condition, it would be possible to increase wildlife quantity and habitat quality without reducing livestock numbers. This is definitely the EIS where the involved agency should have pointed with pride to past range management; 92% good and excellent condition range and a proposed 33% reduction in livestock AUM's. Most incredible.

Response to Mr. Robert M. Hyde

1. Range condition and wildlife habitat condition are not the same. There are many more aspects to good wildlife habitat than diet and good range condition. See revised Foreword.

2. Maximizing livestock production was an alternative initially considered, but was rejected as being totally inconsistent with what the Congress and Service policy have determined to be appropriate purposes and use of national wildlife refuges.

3. The FWS computed AUMs from the inventory conducted by four contract range specialists in strict accordance with SCS stocking guides. The AUMs derived from this method were then subjected to a slope/water matrix to determine availability to livestock. From this process, the Service computed the amount of forage available to livestock found in the Proposed Action. See revised Appendix 15.

4. Competition, both direct and indirect, occur on dual usage ranges. See Appendix 16 for a review of some livestock-wildlife interrelations.

5. Using a linear programming approach to measure the change in livestock revenue per AUM on the CMR resulted in a direct value of $12.87 an AUM. The difference between AUM values reported in Bartlett and Taylor may be due to differences in grazing conditions in Montana and southern Colorado. The multiplier used in this study was larger than Bartlett and Taylor, or $2.67 for each dollar lost. So rather than understate the impacts, relative to Bartlett and Taylor, our multiplier overstates the secondary effect. However, our employment multiplier is smaller. See Appendices 10 and 13 for a more indepth analysis of these uses.

6. Please see Appendix 2, Habitat Evaluation Procedures and Values on Charles M. Russell National Wildlife Refuge, Montana. This section describes the methodology, criteria, and results of these surveys used to assess wildlife habitat on CMR. Most deficiencies are the result of past management, not site potential. Wildlife habitat and range condition are different and not comparable. Please see revised Foreword for a discussion of this relationship.

7. When mapped, most prairie dog towns were associated with poor condition range sites. Poor distribution of livestock, generally around watering areas, was associated with fair range condition sites.

8. The text has been revised.

9. The implementation of any of the alternatives depends on adequate appropriations. If money is not available, introductions would not be made.

10. FWS would like to emphasize that good range condition and good wildlife habitat are not the same.

    See revised Appendix 15 for the detailed methodology used to arrive at the numbers of AUMs left for livestock after the wildlife habitat needs were met.

11. Page 1 of the DEIS merely addresses the highlights of past conflicts and problems. Greater detail is available in the refuge files in Lewistown, Montana; it is beyond the scope of an EIS. FWS believes it is more important to develop a positive course of action for the future, rather than dwell on past conflicts and problems.

12. Usually, the people who responded requesting reduction or elimination of grazing were referring to CMR, not public land in general. They want CMR to be managed as a national wildlife refuge with grazing used as a tool in habitat management. Those respondents that are involved in the livestock industry generally wish to see CMR management continue as is. CMR is a national wildlife refuge and is therefore responsive to national interests as expressed in Congressional mandates and national policies, as well as concerns of the local community.

13. Range condition and wildlife habitat condition are not the same, and corrective measures are not the same for each. Please see Appendix 2 for wildlife species habitat criteria.

14. AUMs on private and state lands are not included in the 60,108 federal AUMs.

15. Examples of desirable exotics on CMR are sweet clover, Merriam's turkey, ring-necked pheasant, and hungarian partridge.

16. During 6½ years of research on black-footed ferrets in South Dakota, never have more than two ferrets been seen on one prairie dog town at the same time unless it was a female with a litter of young. It is probable that they are not only rather solitary, but extremely intolerant of each other except during the breeding season. Be that as it may, introductions will be in accordance with the black-footed ferret recovery plan.

17. You are correct that climax range cannot be improved; the text has been revised. Please see also response #6 above.

18. Under the Proposed Action, during droughts and in years of low forage production, few livestock would have to be removed. Thus, if CMR permittees are less influenced by poor forage conditions, the local livestock industry is more stable and better supported.

19. This page has been revised.

20. More water developments than currently exist on the refuge would be used by wildlife, but are believed not necessary for wildlife. Water in Wyoming may have been a limiting factor for pronghorns, but water is not judged to be a limiting factor for most wildlife on CMR.

21 Constraint #4 simply means that the needs and desires of other individuals and agencies will be considered and integrated into CMR management, as long as they do not prevent the refuge from attaining its stated wildlife objectives.

    The FWS has a fully qualified staff with many years experience in range management, wildlife management, and refuge management. The refuge is authorized by the establishing Executive Order and Public Law 94-223 to administer CMR for the benefit of wildlife.

22. There are presently six rest-rotation and two deferred grazing systems in operation on CMR. None of these systems have been shown to be significantly better than light seasonal grazing with a favorable season of use. Furthermore, intensive systems are a much more expensive alternative than the type of grazing generally suggested in the Proposed Action. However, wildlife and habitat objectives will determine the type of grazing on a specific area.

23. If it is determined a fence is necessary, it would be on the refuge boundary, if the terrain permits.

    We agree new water facilities are generally inconsistent with #2 on page 9. However, once habitat management plans are developed, if they show a specific need for water development on the refuge, water could be developed on the refuge, or off the refuge but in the same allotment, or water could be developed on state or private inholdings. See also response #18 above.

24. Past wildfires on CMR have resulted in excellent shrub communities on many sites. Shrubs responding were snowberry, chokecherry, juniper, etc., as well as numerous forbs. There is no reason to believe prescribed burns would not accomplish the same. Rubber rabbitbrush is heavily browsed by wildlife on CMR.

25. Research has indicated that cattle are a primary detrimental factor influencing shrub availability.

26. Fencing can be one of several alternatives. All riparian areas fenced on CMR to exclude livestock only have responded very well. Based on previous experience, we anticipate continued success.

27. Grasses, forbs, and shrubs respond naturally after fires. The shrub planting would only be to establish seed sources in special areas for certain desirable species, such as buffaloberry.

28. The basis for the proposed 33 percent reduction in livestock AUMs is to meet the needs of wildlife. See revised Appendix 15.

    FWS whole-heartedly agrees that the four range scientists hired on contract are eminently qualified to conduct range surveys. However, once the field survey is completed, it is a matter of using charts, tables, etc., to calculate the AUMs available (1976 SCS National Range Handbook).

29. After reviewing comments and reevaluating the pertinent research, we have deleted ripping from the Proposed Action. The text has been amended.

30. The reason for two years rest following livestock grazing under the Intensive Wildlife Management alternative is that some losses of residual cover, food, and other important wildlife habitat components will be experienced if livestock are grazed each year on a given unit of the refuge. Also, it is important to recognize that wildlife habitat and range condition are not synonymous. Excellent wildlife habitat condition on an area does not necessarily mean that the same area is in excellent range condition.

31. In 1976, Congress passed Public Law 94-223 which changed CMR from a game range, which was primarily operated on a multiple use basis, to a national wildlife refuge so that it could be truly managed as a national wildlife refuge. The Proposed Action will accomplish this; neither the No Action or the Multiple Use alternative will. The wildlife objectives will not be met under these latter two alternatives.

32. Please see response #5 above.

33. The use of ranch budgets and the linear programming approach accounts, in the AUM values, for season of use and availability of substitute forage. The Proposed Action will only reduce AUMs by 33 percent. Full credit in determining stocking rates are given for private and state lands in the analysis.

34. Please review Appendix 16.

35. We have revised the text. Dense nesting cover are included as farmed because these fields were a part of the farming agreement.

36. The FWS does not intend to arrive at a decision based on "votes" for each alternative; however, shown below is a breakdown of individual responses (this does not include government agencies or private organizations):

(a) Support for Proposed Action with minor modification	196
(b) Generally support proposal but emphasize retaining cabins	53
(c) Support No Action or Multiple Use	57
(d) Miscellaneous letters	28

37. The text has been revised.

38. The statement is based on valid research.

39. Aside from prairie dog towns, much of the 7 percent of CMR in fair condition is in the Big Dry Arm, referred to in the text on page 69.

40. The increases and decreases in range condition were based on changes between the 1952 and 1978 range surveys, professional judgement, and current knowledge of the area. The logic in the increase in excellent range condition and a decrease in good range condition is that the trend in range condition has improved some between the 1952 and 1978 surveys, and will continue to do so, i.e., some present good range condition will improve to excellent.

41. See response #29 above.

42. Please refer to Eichorn and Watts, 1974.

43. We agree; "substantially" has been deleted in the text. Range communities will improve in terms of wildlife habitat requirements for the major species of wildlife as identified in the CMR objectives. Also, note that the total AUMs (106,524 and 114,628) are the combination of non-consumptive wildlife AUMs and consumptive livestock AUMs.

44. The FWS agrees that the literature in regard to this matter does not substantiate the statement. However, at least one well-known researcher, who has done considerable sagebrush investigation, feels that the statement is correct (Pyrah, personal communication 1980).

45. The economic portions of the EIS have been corrected.

46. The 4,500 AUM reduction is required under this alternative to practice proper vegetative (range) management in allotments where range improvement is needed.

Prairie dogs would be controlled to prevent their expansion onto adjoining private land and for human health and safety.

The inactive AUMs under this alternative would be included in the reduction, in addition to the 4,500 active AUMs. However, the inactive AUMs would be reactivated when wildlife habitat conditions permit.

47. We agree that the alternative could be modified to minimize or reduce adverse impacts. Examples could be closing roads, restricting the number and type of vehicles, etc. However, most proponents of the multiple use concept do not want these restrictions.

48. The total wildlife AUMs under the No Action and Multiple Use alternatives are 60,000 AUMs and 74,000 AUMs, respectively. These AUMs, according to range objective number 2, must be provided before livestock AUMs will be available. Thus, if wildlife objectives are not met, range objectives cannot be met, as stated in the text. Also see Tables 13 and 15 on pages 80 and 96.

49. Maximizing livestock production was an alternative that was initially considered but was rejected as being totally inconsistent with what Congress and Service policy have determined to be an appropriate purpose and use of a national wildlife refuge.

Box 649
Glasgow, Mt 59230
Nov 11, 1980

Erwin H. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3035
316 North 26th St.
Billings, Mt 59101

Dear Mr. Steucke:

My wife and I strongly oppose any expansion of wildlife facilities and habitat on the CMR game reserve. Instead we would favor any moves that would increase the amount of land that could be used or sold to private users.

We don't understand your reasoning that the amounts of wildlife would increase in any of your proposals. We have had a cabin on Fort Peck Lake since 1966. When we first built we were alone on the point where we are located. Rarely if ever did we see a deer. Occasionally we saw Hungarian partridges and grouse. Now that we have neighbors and all of us have trees and gardens, we see deer on a weekly basis. There are many coveys of Huns and grouse. It is common to see pheasants. In plain English, development by private parties has helped not hindered wildlife.

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As further proof that wildlife is compatible with development, I can further attest that on the farm where I grew up we never saw a deer while I was growing up and there were many areas of virgin prairie. Now that the farm is practically all cropland, deer are regularly seen. For these reasons I see no reasons whatsoever to curtail further development.

Further it would be a great shame that the thousands of acres which make up the CMR game reserve were taken away from use by people - particularly the ranchers and farmers who were pioneers in the area and who built up property for future use by their families. I don't think that Fort Peck Lake and the Dam were built for the purpose of providing a wildlife preserve. It was built for flood control and power development and recreational use was really a secondary benefit.

We plan to oppose any and all plans which will curtail the people use of the

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lands that make up the CMR game range. This includes all uses of the Lake for recreation and commercial fishing. This includes all private cabin sites. This includes all farming and ranching leases. And in addition we will work to return portions of this range to private ownership wherever and whenever feasible.

Sincerely,

Geo. Johnson
Alma Johnson

Route 2
Westby, Montana
October 20, 1980

Erwin W. Steucke
Fish & Wildlife Service
Federal Building, Rm 3035
316 North 26th Street
Billings, Montana

Dear Mr. Steucke:

I would like to express my support for the proposed action management plan for Charles M. Russell National Wildlife Refuge. I would also like to comment on three points which I feel were not given adequate coverage in the draft management plan. The first of these is the effect of soil ripping upon existing native plant communities and also upon such archaeological features as tipi rings. Second, I feel the Swift Fox did not seem to warrent the same concern as some of the other endangered species. Is this because the Swift fox, although almost certainly gone from most of the northern Plains, is not "officially" on the endangered species list? 1 Finally, I feel that bison should eventually play a much larger role, ideally approaching their original status, in CMR's ecosystem. If this is not possible at present perhaps buffalo ranchers could be given preference in grazing allotments and at least a portion of the refuge reserved for bison. 2

Sincerely yours

Dennis C. Joyes

Dennis C. Joyes

Response to Mr. Dennis C. Joyes

1. Each alternative which proposes to introduce endangered species also includes swift foxes. However, by law, species officially listed as endangered must receive priority.

2. The FWS is willing to work with any permittee who would consider the possibility of utilizing his AUMs for bison rather than cattle.

GALLAGHER, ARCHAMBEAULT & KNIERIM
PROFESSIONAL CORPORATION · ATTORNEYS AT LAW

FRANCIS GALLAGHER
G. T. ARCHAMBEAULT
MATTHEW W. KNIERIM

[illegible] AVENUE SOUTH · BOX [illegible]
GLASGOW, MONTANA [illegible]
[illegible]

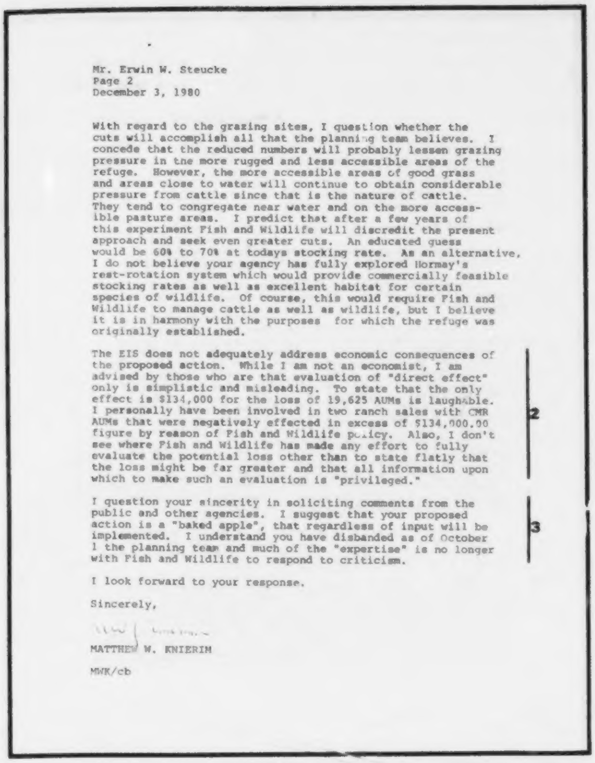
December 3, 1980

Mr. Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Bldg., Room 3035
316 North 26th Street
Billings, MT 59101

Dear Wally:

I have received the draft EIS for the Charles M. Russell National Wildlife Refuge and offer the following comments.

I am a little amazed at the manner in which your agency ignores its own regulations to arrive at a politically desirable result. At 50 C.F.R., Sec. 26.35 states clearly that under no circumstance is the government to renew existing cabin site permits within a national wildlife refuge. Further the phase-out provisions of 43 C.F.R., Part 21, apply to any existing permits on a wildlife refuge. I see nothing in the original withdrawals that permits Fish and Wildlife to delegate its management of so called "Corps areas" of the refuge to the multiple use Corps of Engineers. If your agency is persistant in this Corps - Fish and Wildlife distinction as to management of lands in the refuge, then I question your ability to make grazing cuts under the proposed action on so-called Corps lands within the refuge. When one looks at title, all of the lands are owned by the United States. The Corps was delegated specifically the job of operating the reservoir for power generation and flood control. The Fish and Wildlife was delegated the adjoining lands for a wildlife refuge for specific species and under specific conditions. Do you have an executive order or congressional act wherein the cabin site areas were deleted from the National Wildlife Refuge? You admit in the EIS at page 66 that retention of cabin sites results in a loss of habitat. Under Alternative C (page 20) you seem to admit that Fish and Wildlife has the power and the obligation under this alternative to remove cabin sites. Why are you able to ignore the requirements of your own regulations as to removal of cabin sites under the proposed actions? I would like an analytical and reasoned response to this question. At the very least, you should be seeking congressional clarification of the cabin site issue before attempting to implement a plan in violation of your own regulations. 1



Mr. Erwin W. Steucke
Page 2
December 3, 1980

With regard to the grazing sites, I question whether the cuts will accomplish all that the planning team believes. I concede that the reduced numbers will probably lessen grazing pressure in the more rugged and less accessible areas of the refuge. However, the more accessible areas of good grass and areas close to water will continue to obtain considerable pressure from cattle since that is the nature of cattle. They tend to congregate near water and on the more accessible pasture areas. I predict that after a few years of this experiment Fish and Wildlife will discredit the present approach and seek even greater cuts. An educated guess would be 60% to 70% at todays stocking rate. As an alternative, I do not believe your agency has fully explored Hormay's rest-rotation system which would provide commercially feasible stocking rates as well as excellent habitat for certain species of wildlife. Of course, this would require Fish and Wildlife to manage cattle as well as wildlife, but I believe it is in harmony with the purposes for which the refuge was originally established.

The EIS does not adequately address economic consequences of the proposed action. While I am not an economist, I am advised by those who are that evaluation of "direct effect" only is simplistic and misleading. To state that the only effect is $134,000 for the loss of 19,625 AUMs is laughable. I personally have been involved in two ranch sales with CMR AUMs that were negatively effected in excess of $134,000.00 figure by reason of Fish and Wildlife policy. Also, I don't see where Fish and Wildlife has made any effort to fully evaluate the potential loss other than to state flatly that the loss might be far greater and that all information upon which to make such an evaluation is "privileged." 2

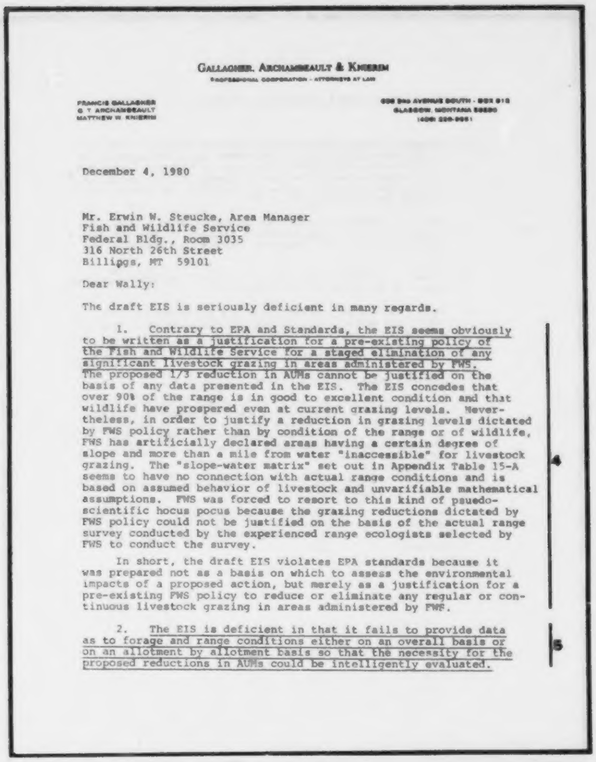
I question your sincerity in soliciting comments from the public and other agencies. I suggest that your proposed action is a "baked apple", that regardless of input will be implemented. I understand you have disbanded as of October 1 the planning team and much of the "expertise" is no longer with Fish and Wildlife to respond to criticism. 3

I look forward to your response.

Sincerely,

MATTHEW W. KNIERIM

MWK/cb



GALLAGHER, ARCHAMBEAULT & KNIERIM
PROFESSIONAL CORPORATION · ATTORNEYS AT LAW

FRANCIS GALLAGHER
G. T. ARCHAMBEAULT
MATTHEW W. KNIERIM

[illegible] 2ND AVENUE SOUTH · BOX [illegible]
GLASGOW, MONTANA [illegible]
(406) [illegible]

December 4, 1980

Mr. Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Bldg., Room 3035
316 North 26th Street
Billings, MT 59101

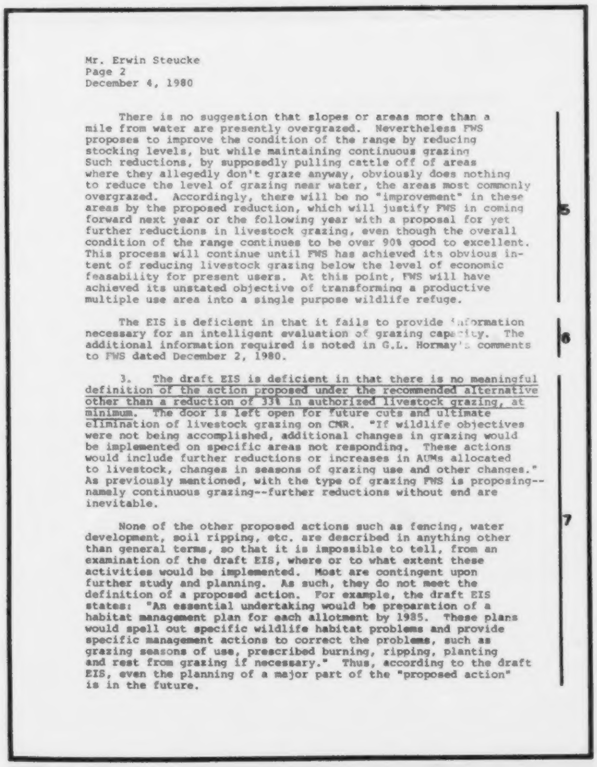
Dear Wally:

The draft EIS is seriously deficient in many regards.

1. Contrary to EPA and Standards, the EIS seems obviously to be written as a justification for a pre-existing policy of the Fish and Wildlife Service for a staged elimination of any significant livestock grazing in areas administered by FWS. The proposed 1/3 reduction in AUMs cannot be justified on the basis of any data presented in the EIS. The EIS concedes that over 90% of the range is in good to excellent condition and that wildlife have prospered even at current grazing levels. Nevertheless, in order to justify a reduction in grazing levels dictated by FWS policy rather than by condition of the range or of wildlife, FWS has artificially declared areas having a certain degree of slope and more than a mile from water "inaccessible" for livestock grazing. The "slope-water matrix" set out in Appendix Table 15-A seems to have no connection with actual range conditions and is based on assumed behavior of livestock and unvarifiable mathematical assumptions. FWS was forced to resort to this kind of psuedo-scientific hocus pocus because the grazing reductions dictated by FWS policy could not be justified on the basis of the actual range survey conducted by the experienced range ecologists selected by FWS to conduct the survey. 4

In short, the draft EIS violates EPA standards because it was prepared not as a basis on which to assess the environmental impacts of a proposed action, but merely as a justification for a pre-existing FWS policy to reduce or eliminate any regular or continuous livestock grazing in areas administered by FWS.

2. The EIS is deficient in that it fails to provide data as to forage and range conditions either on an overall basis or on an allotment by allotment basis so that the necessity for the proposed reductions in AUMs could be intelligently evaluated. 5



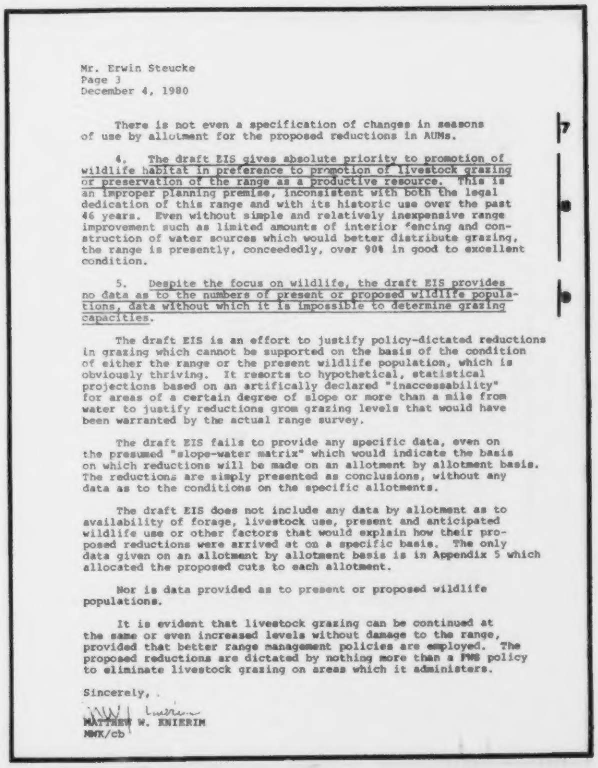
Mr. Erwin Steucke
Page 2
December 4, 1980

There is no suggestion that slopes or areas more than a mile from water are presently overgrazed. Nevertheless FWS proposes to improve the condition of the range by reducing stocking levels, but while maintaining continuous grazing Such reductions, by supposedly pulling cattle off of areas where they allegedly don't graze anyway, obviously does nothing to reduce the level of grazing near water, the areas most commonly overgrazed. Accordingly, there will be no "improvement" in these areas by the proposed reduction, which will justify FWS in coming forward next year or the following year with a proposal for yet further reductions in livestock grazing, even though the overall condition of the range continues to be over 90% good to excellent. This process will continue until FWS has achieved its obvious intent of reducing livestock grazing below the level of economic feasability for present users. At this point, FWS will have achieved its unstated objective of transforming a productive multiple use area into a single purpose wildlife refuge. 5

The EIS is deficient in that it fails to provide information necessary for an intelligent evaluation of grazing capacity. The additional information required is noted in G.L. Hormay's comments to FWS dated December 2, 1980. 6

3. The draft EIS is deficient in that there is no meaningful definition of the action proposed under the recommended alternative other than a reduction of 33% in authorized livestock grazing, at minimum. The door is left open for future cuts and ultimate elimination of livestock grazing on CMR. "If wildlife objectives were not being accomplished, additional changes in grazing would be implemented on specific areas not responding. These actions would include further reductions or increases in AUMs allocated to livestock, changes in seasons of grazing use and other changes." As previously mentioned, with the type of grazing FWS is proposing--namely continuous grazing--further reductions without end are inevitable.

None of the other proposed actions such as fencing, water development, soil ripping, etc. are described in anything other than general terms, so that it is impossible to tell, from an examination of the draft EIS, where or to what extent these activities would be implemented. Most are contingent upon further study and planning. As such, they do not meet the definition of a proposed action. For example, the draft EIS states: "An essential undertaking would be preparation of a habitat management plan for each allotment by 1985. These plans would spell out specific wildlife habitat problems and provide specific management actions to correct the problems, such as grazing seasons of use, prescribed burning, ripping, planting and rest from grazing if necessary." Thus, according to the draft EIS, even the planning of a major part of the "proposed action" is in the future. 7



Mr. Erwin Steucke
Page 3
December 4, 1980

There is not even a specification of changes in seasons of use by allotment for the proposed reductions in AUMs. 7

4. The draft EIS gives absolute priority to promotion of wildlife habitat in preference to promotion of livestock grazing or preservation of the range as a productive resource. This is an improper planning premise, inconsistent with both the legal dedication of this range and with its historic use over the past 46 years. Even without simple and relatively inexpensive range improvement such as limited amounts of interior fencing and construction of water sources which would better distribute grazing, the range is presently, conceededly, over 90% in good to excellent condition. 8

5. Despite the focus on wildlife, the draft EIS provides no data as to the numbers of present or proposed wildlife populations, data without which it is impossible to determine grazing capacities. 9

The draft EIS is an effort to justify policy-dictated reductions in grazing which cannot be supported on the basis of the condition of either the range or the present wildlife population, which is obviously thriving. It resorts to hypothetical, statistical projections based on an artifically declared "inaccessability" for areas of a certain degree of slope or more than a mile from water to justify reductions grom grazing levels that would have been warranted by the actual range survey.

The draft EIS fails to provide any specific data, even on the presumed "slope-water matrix" which would indicate the basis on which reductions will be made on an allotment by allotment basis. The reductions are simply presented as conclusions, without any data as to the conditions on the specific allotments.

The draft EIS does not include any data by allotment as to availability of forage, livestock use, present and anticipated wildlife use or other factors that would explain how their proposed reductions were arrived at on a specific basis. The only data given on an allotment by allotment basis is in Appendix 5 which allocated the proposed cuts to each allotment.

Nor is data provided as to present or proposed wildlife populations.

It is evident that livestock grazing can be continued at the same or even increased levels without damage to the range, provided that better range management policies are employed. The proposed reductions are dictated by nothing more than a FWS policy to eliminate livestock grazing on areas which it administers.

Sincerely,

MATTHEW W. KNIERIM
MWK/cb

Response to Mr. Matthew W. Knierim

1. Existing private cabins within the executive boundary of CMR are on either land administered as a State Park, e.g., Hell Creek, or on land withdrawn or purchased by the Corps of Engineers for the Fort Peck Project and over which COE has retained its interest in recreational development and management. Conversely, FWS has the responsibility for all grazing within CMR.

2. The entire economic situation was reevaluated using a linear programming approach to more accurately delineate the economic impacts. The text has also been revised and expanded. See also Appendices 10 and 13.

3. Although the Planning Team has been disbanded, sufficient expertise exists in the FWS to respond to comments.

4. Range condition and wildlife habitat are not synonomous. The slope-water matrix used in Appendix 15 is based on valid scientific studies.

5. Please see Appendices 8 and 9.

6. See response to Mr. August L. Hormay.

7. The level of detail you propose is beyond the scope of an EIS. For example, habitat was evaluated on a section-by-section basis, and detailed plans will be prepared for individual allotments. There are over 1,000 sections on CMR and over 50 allotments on CMR; detailed information is available for review at the Lewistown refuge headquarters.

8. The priority of wildlife is correct, legal, and in accordance with FWS policy and mandates.

9. Because wildlife is a resource based upon habitat, all descriptions are keyed to that resource base. Actual wildlife populations may be influenced by factors other than habitat, but at CMR habitat is limiting.

Mr. Ron Koszyk
132 Walton Ave.
South Bend, IN 46619

November 28, 1980

Area Manager
U.S. Fish and Wildlife Service
Room 3035
Federal Building
316 North 26th Avenue
Billings, Montana 59101

Dear Area Manager:

I am writing to state my opinion on the proposed management of Charles M. Russell National Wildlife Refuge.

After reading this draft plan and much thought I had narrowed my choice to two: the Proposed Action and the No Grazing.

I like the whole plan of the Proposed Action except for the number of AUM's allowed for cattle grazing. As stated in Appendix 16, grazing by livestock has relatively few benefictial impacts upon wildlife. Heavy to moderate grazing is detrimental to wildlife. While light grazing does "no harm, no good". My idea of light graing is not 40,628 AUM's as stated in Proposed Action Plan. Light grazing of cattle first of all should depend upon how the wildlife are doing each year. If there are droughts, erosion, or whatever wildlife should get first priority. This would mean no cattle grazing in bad years on CMR. In good years livestock should be restricted to no more than 15,000 to 20,000 AUM's (roughly). This is a drastic cut. This amount of AUM's would hopefully ameliorate the resulting conditions on adjacent private lands as compared to resulting conditions of a no-grazing plan. I feel this way because CMR is a wildlife refuge, devoted to wildlife. 1

I feel the no-grazing is ideal on paper but in reality it would cause grave environmental problems outside of the refuge and would be hard to implement. This factors are what changed my mind toward the proposed action.

Therfore, I am in favor to a revised Proposed Action bill which would lower the cattle AUM's to 20,000 or so. The number of AUM's is the only part of the bill which I object to. My opinion is based upon the idea that by the year 2000, these lands adjacent to CMR will be stocked to maximum capacity with livestock. This will be because of more population in the world which will demand more meat. Also development of synthetic fuels and oil shale, coal will incresingly

put pressure on the wildlife out West. CMR will probably end up as an "island" refuge surrounded by energy development and crowding livestock. That is why I support a management policy which allows very light grazing. I feel this is enough to expunge the problems of the surrounding environment and yet to give good adequate protection to wildlife. I feel all these problems we have today regarding land management all belong to the past leaders. If they would have planned the develop ment of the land, like they are trying to do in Alaska, we would all be better off.

I hope my opinion will help somewhat in the decision of which management policy to take.

Sincerely your,

Ron Koszyk

Ron Koszyk
132 Walton Ave.
South Bend, IN 46619

Response to Mr. Ron Koszyk

1. The proposed level of grazing is based on the total amount available less that needed by wildlife and is derived from recent scientific studies.

319 South 20th St
Worland, Wyoming
December 2, 1980

824/01

Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3035
316 North 26th Street
Billings, Montana 59101

Dear Sir:

It is apparent, after reviewing the CMR EIS, that management of the refuge must be for wildlife. Livestock grazing should be limited to that necessary to achieve desired habitat for wildlife.

The mention of stating grazing income of $107,000 being contributed to the US Treasury is very misleading. Management of the grazing activities by refuge personnel probably costs nearly this much in salary. When one considers how grazing prevents achievement of potential wildlife habitat on a National Refuge, it is kind of mindless. Multiple use management is fine for BLM and FS but has no place on National Wildlife Refuges. I was kind of set back a step or two as I thought this practice had ceased. 1

If the CMR is to achieve wildlife habitat goals the "No Grazing Alternative" must be integrated into the "Proposed Action". If not done, the concentrated grazing will continue to maintain undesirable wildlife habitat conditions in many areas.

Sincerely,

Richard L. Kroger

Response to Mr. Richard L. Kroger

1. You are correct that it is misleading; however, many of the personnel salary costs would occur even if grazing were not allowed.

Richard A. Prodgers
2715 Ottawa
Butte, Montana 59701
723-6022
494-6375
587-6375

Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3035
316 N. 26th Street
Billings, Montana 59101

Dear Mr. Stuecke:

Thank you for this opportunity to comment on the draft EIS for the CMR-NWR. In most areas I think this statement is really quite good and I commend you. Alternative B is my preference.

I believe that you have made one serious mistake in your calculations. I hoped to have time to prepare a thorough literature review showing your error, but I can see I won't have time. This will have to do.

As I read your EIS, it becomes apparent that you believe the vegetation of the CMR to be rather static. You think the vegetation will remain the same if no action is taken,and you believe that incremental improvements in composition will accrue as a result of rather minor changes in grazing. In this you are wrong. To predict the vegetation in the year 2000 as you do is pure nonsense. Forgive me now if I lecture you, but I think you misapprehend the nature of vegetation in semi-arid lands.

As Barnes (1959) points out, the distribution of natural grasslands is primarily a function of climate. Grasslands are found in regions of climatic extremes, such as the Great Plains with its low and irregular rainfall. Leopold (1959) notes that variability is one of the principal attributes of semi-arid lands and that "long periods of deficit moisture are indeed part of the pattern." If you doubt this, see Lommasson (1947) for his presentation of data for Miles City and Figure I. 1

So what? Reed and Peterson (1961) found that the major trends in mixed prairie vegetation are set by major weather cycle, while the rate of change within trends is determined by grazing intensity.

Not only production but also composition is affected. In contrast, you state that "The climax plant community for a site varies slightly from year to year but the kinds and percentage of plant composition remain about

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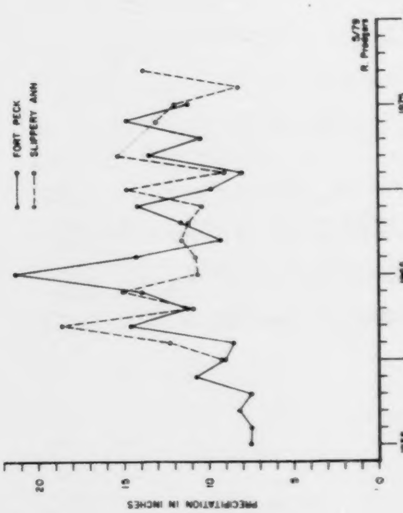

5/79
R. Prodgers

Figure I

Annual Precipitation of Fort Peck and Slippery Ann Wildlife Station the same if undisturbed." This may be true if you consider the weather to be a disturbance. Otherwise, you are wrong. Coupland and others (1960) warn against determining range condition based upon the climax in another phase of the weather cycle. I hope you'll read this paper. You should also read another article of Coupland's (1959) because of his excellent short literature review of drastic weather-induced changes in vegetation and his own finding of "remarkable" vegetation changes in response to weather.

There are two points I am trying to make here. First, the vegetational changes are a far more complex phenomenon than you take them to be, and weather can be a stronger agent of change than grazing. I believe you are on shaky grounds in your grazing assumptions too, but I don't have time to go into this. Second, I believe your range condition ratings are wrong--they are too high. This stems from the extremely high rainfall (and snowfall) of 1978 and your failure to recognize the effect. 1

Don't believe it? Then you'd better look at Figures 2 through 6. These presently unpublished data were collected in exclosures less than 20 miles from the CMR-NWR. Anyone familiar with the range condition rating system can see that 1978 had a far higher production of decreasers and increasers present in "climax" than other years. Note especially the graph for Agropyron smithii, the major Refuge grass.

This is not a new discovery. The effects of low precipitation and grazing (or high precipitation and less grazing) can easily be confounded. In a study of Canadian mixed prairie with many principal species in common with the Refuge, Coupland and others (1960) noted that "each major species responded to improved moisture conditions in a manner opposite to its response to grazing." The effects of drought noted by Clarke and others (1943) and Ellison and Woolfolk (1937) are quite similar to the effects of overgrazing.

To conclude this section, you are dreaming when you predict the vegetation far into the future. I realize that other federal agencies such as the BLM and SCS do this, but it is just pipe dreaming. Second, your range condition ratings are too high, I cannot tell by how much.

On more minor points:

p. 10. Your section on habitat management is quite good.

p. 13. You state that in years of below average forage production, grazing permits may be suspended. Really? This takes guts. How would you know ahead of time? What would the leasee do with his livestock? Sounds good but I doubt it. 2

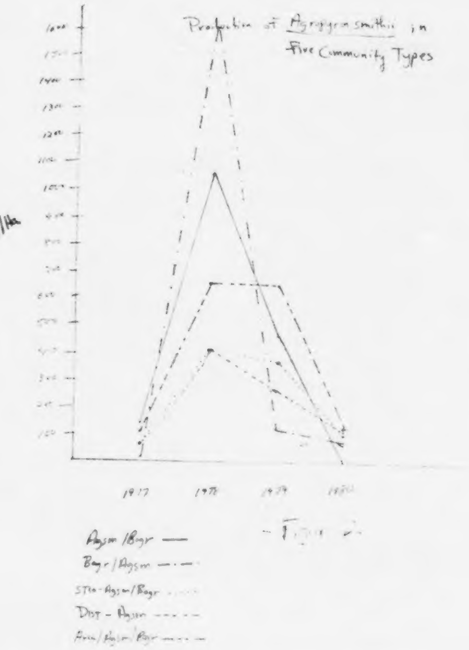

Figure 2

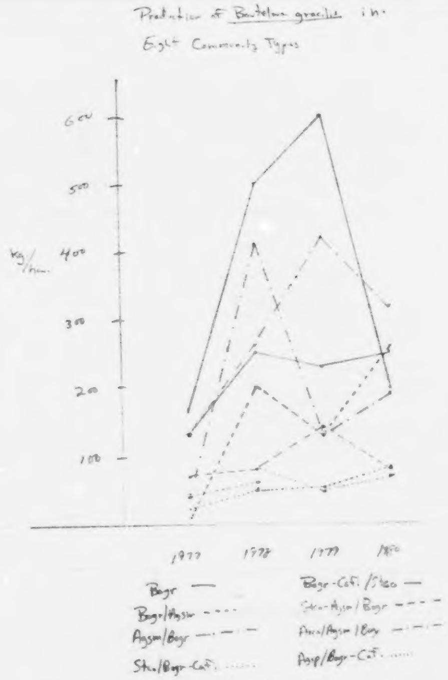

Figure 3

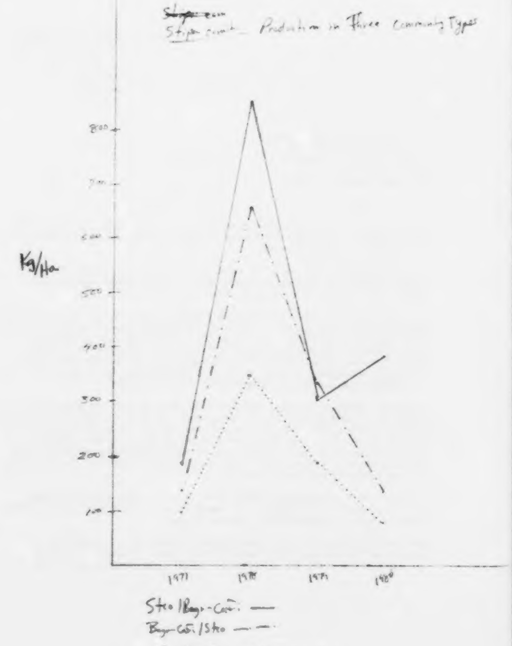

Figure 4

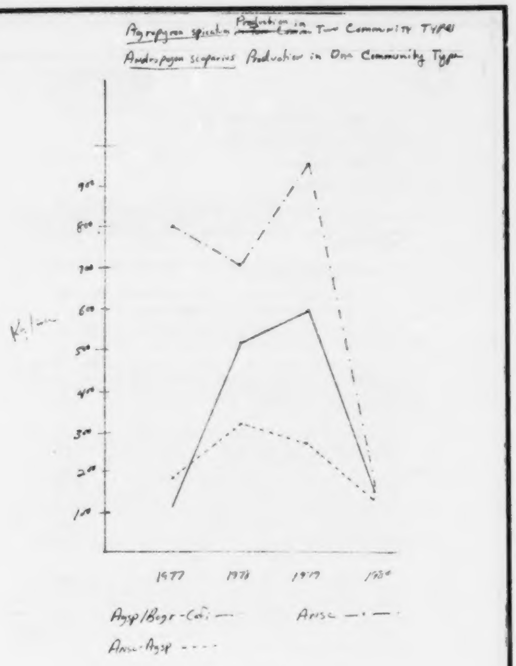

Figure 5

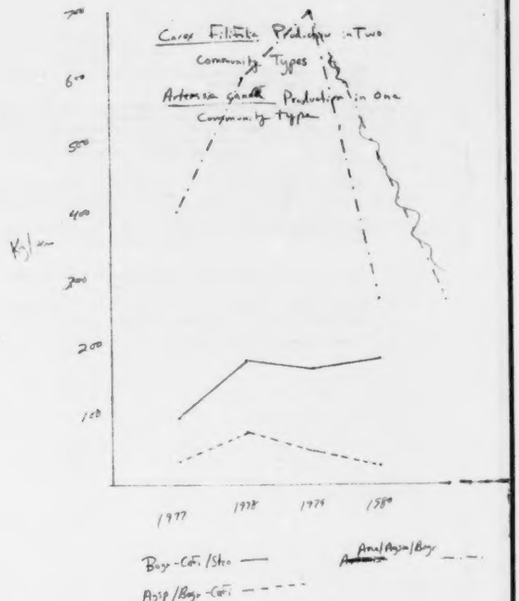

Figure 6

Your grazing "problem" is due to past mismanagement, but some factions are trying to make it look like an attempt at a solution is the problem. In past management those AUMs were not "excess".

It is alarming to see that "multiple use" appears more beneficial to wildlife and related concerns than "no action".

p. 64. Your idea of the relationship between sagebrush and grazing is too simple. I really don't have time to go into it, but Highway 24 is near a principal distribution line for big sagebrush (Morris and others, 1976)--ponder that. Overgrazed areas to the east do not develop into sagebrush stands. Be careful in extrapolating from other areas. You grossly oversimplify about grazing and sagebrush again on p. 76. And you are really way off when you lump silver and big sagebrush. 3

P. 83. You predict that shurbs would improve for 40-50 years, but elsewhere you note that buffaloberry was nearly eradicated by a drought. Of course, there can never be another drought. 4

What the heck is this "shadscale" you keep mentioning? I am under the impression that "shadscale saltbrush" (Atriplex confertifolia) is uncommon on the Refuge. The little annual A. dioica is common and even dominant on shale outcrops, but I have never heard it called shadscale. 5

If this sounds over-critical, let me say that in general I think you did a fine job, it's high time that the CMR-NWR is managed for wildlife, and I think you have made an excellent beginning. I heartily endorse your proposed action, and I recommend that you get a good plant ecologist to direct your habitat efforts since wildlifers aren't generaly qualified.

Now let's see you put words into action!

Thank you for this opportunity to comment.

Sincerely,

10/29/80

Richard A Prodgers

Richard A. Prodgers

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Response to Mr. Richard A. Prodgers

1. The FWS agrees with your statement that weather can be a stronger agent of change than grazing.

   The Range Site and Condition Inventory was completed by four range specialists on contract. These four individuals have between them over 100 years of range inventory experience, and the FWS accepts their conclusions as to range condition. It should be noted, though, that the FWS will manage the area on the basis of wildlife habitat, not range condition.

2. CMR is a wildlife refuge, and during years of poor forage production, a corresponding decrease in AUMs or changes in seasons of use will occur to protect range resources and wildlife values. Grazing changes could conceivably occur during the middle of a season as forecasting of droughts is not possible. This action would be in accordance with Executive Order 7509 and the legislative mandates of the FWS.

3. See revised text. FWS agrees that silver sagebrush and big sagebrush prefer different range sites and should not be lumped.

4. The FWS acknowledges that drought can impact shrub production and that a drought could set back shrub improvement goals.

5. We have revised the text appropriately.

---

410 Woodworth Ave.
Missoula, Montana 59801
December 3, 1980

Mr. Erwin W. Stenoke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3035
316 No. 26th St.
Billings, Montana

Dear Mr. Stenoke:

I wish to express my support for Alternative B of the Draft EIS for the Management of Charles M. Russell National Wildlife Refuge with recommendations for the following amendments:

1. Include UL Bend waterfowl production increase from Alternative C.
2. Temporary fencing or grazing restrictions to assure riperian zone revegetation.
3. Plant Ponderosa pine east of Timber Creek to improve elk cover.

A shoreline scenic road would greatly increase human influence on wildlife; create cattle rustling and poaching problem; and consume large sums of money which could be better used to increase forage and cover for livestock and wildlife. 1

If the "Overall results of range conditions found on grazing allotments subjected to livestock grazing are excellent, 18 percent; good, 74 percent; fair, 7 percent; and poor, 1 percent." is not clarified, it is going to be politically impossible to reduce grazing by 33 percent. Rather than leading the public to believe that 92 percent of the land is in good or excellent condition, I would suggest that they be told that under the rating method used 72 percent of the land could be producing 51 percent or less of its capabilities. Also the above statement should not stand alone but should be given with the rating for the land outside of grazing allotments. 2

To justify grazing reductions it would be advisable to have another range analysis by range scientists who are more familiar with wildlife requirements and have not been associated with domestic grazing as a career. I have been on much of the area and have discussed it with range scientists and must conclude that range condition ratings in the Draft are too high. 3

I commend those who prepared the Draft, those who organized and conducted the hearings, and those who bit the bullet in selecting a proposed alternative. Thank you for the opportunity of participating.

Sincerely,

Donald Aldrich
Donald Aldrich

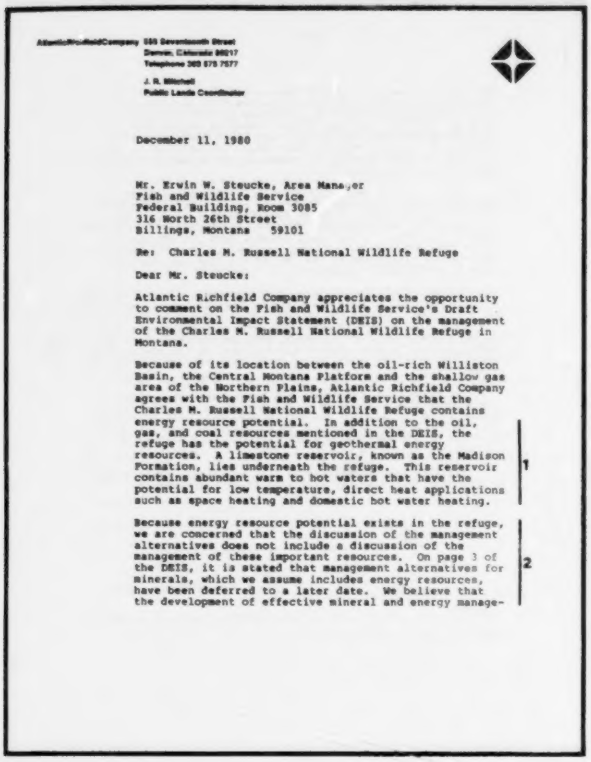
cc: Thomas L. Kimball
Chuck Griffith
Gary Day
Wilbur Rehmann

Response to Mr. Donald Aldrich

1. An extensive shoreline scenic road is not proposed for CMR.

2. Because habitat is recognized as the key to wildlife abundance, this document emphasizes habitat quality and quantity. Range conditions and wildlife habitat are not the same and should not be used synonymously. Range condition measures such parameters as species composition and production and does not address important wildlife habitat components such as residual cover, vegetative interspersion, and diversity, nor does it attach sufficient importance to key wildlife shrub communities.

3. The FWS computed AUM's from the inventory conducted by four contract range specialists in strict accordance with SCS stocking guides. The AUMs derived from this method were then subjected to a slope/water matrix to determine availability to livestock. From this process, the FWS computed the amount of forage available to livestock found in the Proposed Action. See revised Appendix 15.



AtlanticRichfieldCompany 555 Seventeenth Street
Denver, Colorado 80217
Telephone 303 575 7577

J. R. Mitchell
Public Lands Coordinator

December 11, 1980

Mr. Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3085
316 North 26th Street
Billings, Montana 59101

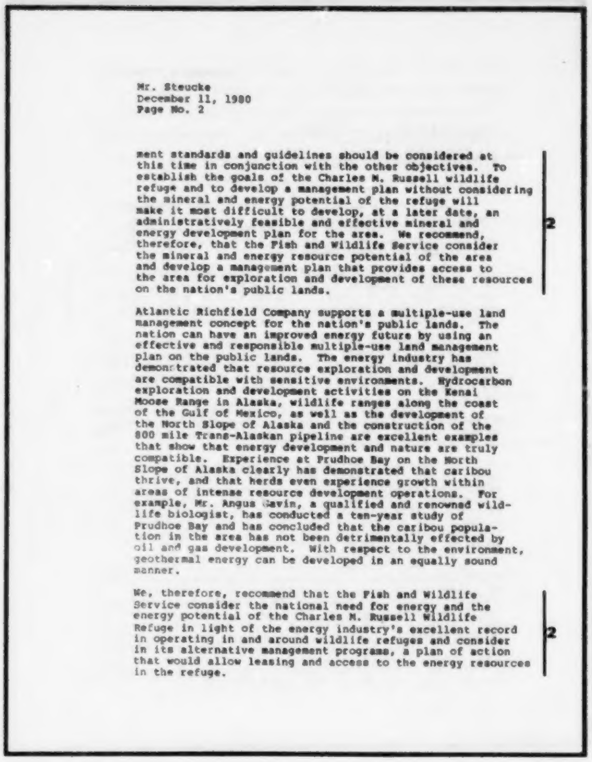
Re: Charles M. Russell National Wildlife Refuge

Dear Mr. Steucke:

Atlantic Richfield Company appreciates the opportunity to comment on the Fish and Wildlife Service's Draft Environmental Impact Statement (DEIS) on the management of the Charles M. Russell National Wildlife Refuge in Montana.

Because of its location between the oil-rich Williston Basin, the Central Montana Platform and the shallow gas area of the Northern Plains, Atlantic Richfield Company agrees with the Fish and Wildlife Service that the Charles M. Russell National Wildlife Refuge contains energy resource potential. In addition to the oil, gas, and coal resources mentioned in the DEIS, the refuge has the potential for geothermal energy resources. A limestone reservoir, known as the Madison Formation, lies underneath the refuge. This reservoir contains abundant warm to hot waters that have the potential for low temperature, direct heat applications such as space heating and domestic hot water heating. 1

Because energy resource potential exists in the refuge, we are concerned that the discussion of the management alternatives does not include a discussion of the management of these important resources. On page 3 of the DEIS, it is stated that management alternatives for minerals, which we assume includes energy resources, have been deferred to a later date. We believe that the development of effective mineral and energy manage- 2

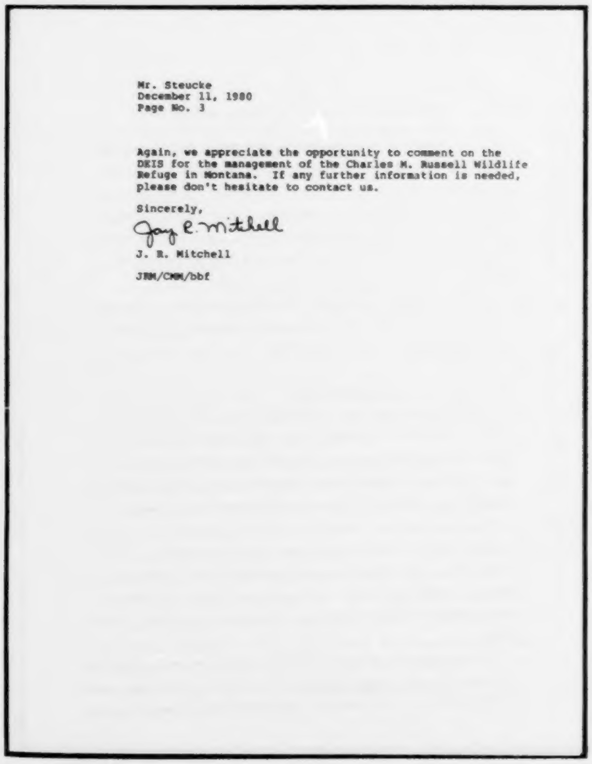


Mr. Steucke
December 11, 1980
Page No. 2

ment standards and guidelines should be considered at this time in conjunction with the other objectives. To establish the goals of the Charles M. Russell wildlife refuge and to develop a management plan without considering the mineral and energy potential of the refuge will make it most difficult to develop, at a later date, an administratively feasible and effective mineral and energy development plan for the area. We recommend, therefore, that the Fish and Wildlife Service consider the mineral and energy resource potential of the area and develop a management plan that provides access to the area for exploration and development of these resources on the nation's public lands. 2

Atlantic Richfield Company supports a multiple-use land management concept for the nation's public lands. The nation can have an improved energy future by using an effective and responsible multiple-use land management plan on the public lands. The energy industry has demonstrated that resource exploration and development are compatible with sensitive environments. Hydrocarbon exploration and development activities on the Kenai Moose Range in Alaska, wildlife ranges along the coast of the Gulf of Mexico, as well as the development of the North Slope of Alaska and the construction of the 800 mile Trans-Alaskan pipeline are excellent examples that show that energy development and nature are truly compatible. Experience at Prudhoe Bay on the North Slope of Alaska clearly has demonstrated that caribou thrive, and that herds even experience growth within areas of intense resource development operations. For example, Mr. Angus Gavin, a qualified and renowned wildlife biologist, has conducted a ten-year study of Prudhoe Bay and has concluded that the caribou population in the area has not been detrimentally effected by oil and gas development. With respect to the environment, geothermal energy can be developed in an equally sound manner.

We, therefore, recommend that the Fish and Wildlife Service consider the national need for energy and the energy potential of the Charles M. Russell Wildlife Refuge in light of the energy industry's excellent record in operating in and around wildlife refuges and consider in its alternative management programs, a plan of action that would allow leasing and access to the energy resources in the refuge. 2



Mr. Steucke
December 11, 1980
Page No. 3

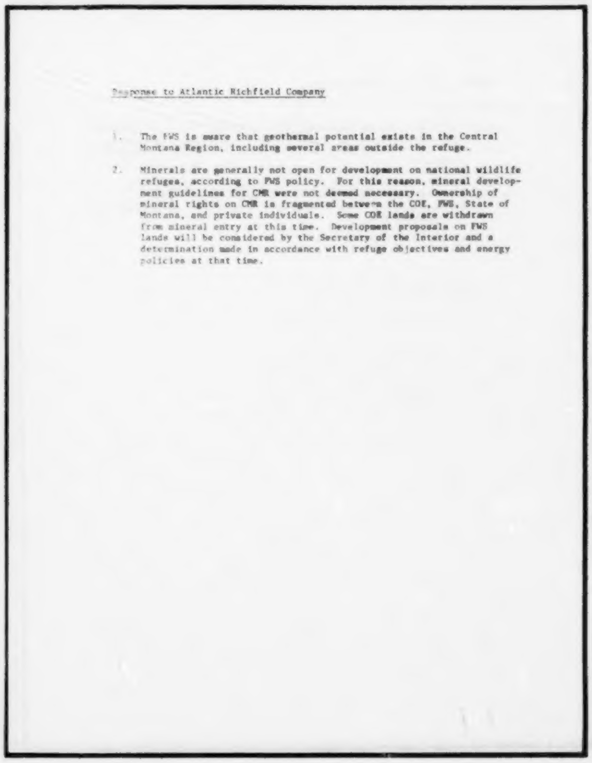
Again, we appreciate the opportunity to comment on the DEIS for the management of the Charles M. Russell Wildlife Refuge in Montana. If any further information is needed, please don't hesitate to contact us.

Sincerely,

Jay R. Mitchell

J. R. Mitchell

JRM/CMM/bbf



Response to Atlantic Richfield Company

1. The FWS is aware that geothermal potential exists in the Central Montana Region, including several areas outside the refuge.

2. Minerals are generally not open for development on national wildlife refuges, according to FWS policy. For this reason, mineral development guidelines for CMR were not deemed necessary. Ownership of mineral rights on CMR is fragmented between the COE, FWS, State of Montana, and private individuals. Some COE lands are withdrawn from mineral entry at this time. Development proposals on FWS lands will be considered by the Secretary of the Interior and a determination made in accordance with refuge objectives and energy policies at that time.

December 5, 1980

Erwin W. Steucke, Area Manager
Fish and Wildlife Service
316 North 26th Street
Billings, Montana 59101

Dear Sir:

Formally I set on the quieter side of the political scene, and have little to say, except for my privileged voting right. A letter of this nature, therefore, is somewhat difficult for me, but to make things right with myself and family, I must write this.

To begin with, my occupation is commercial fishing on th Fort Peck Reservoir, an occupation that I have been involved with for 14 years. In going back thru the Draft EIS once more, I still find nothing of any nature, pertaining to this aspect of impact on Northeastern Montana. 1

I have attended both EIS Meetings held in Glasgow, and rightfully so, the drift was in favor of the troubled cattle business in the area. The farming and ranching is vital to this area and naturally these people are going to fight to the ultimate end to retain their land and rights.

As one individual comment, and one letter being written, I have no idea what good it may do, but I feel that somehow we must be heard. The EIS as is compiled, becomes very harsh as it goes into it's five alternatives.

Most people in this area fully realize that the wildlife aspect of the CMR is very important to the economy of this portion of the state. Personally, I am an avid hunter and outdoorsman, as well as my wife and family. Not only to make my living, but also hunting, fishing, and just plain sight seeing on the CMR are very important to us in this area, and I feel that anyone trying to take any part of it from us is wrong and unjustified in any respect.

At the first EIS meeting in Glasgow at the Valley County Courthouse, the meeting coordinator stood before us and said that there would be no further changes in the road systems on CMR, until an EIS was drafted. This spring when I moved up the reservoir to Sutherland Creek Bay, I found a new "No Off Road Vehicle Sign" in the middle of the road that I had used to gain access to the water. I called the Montana Department of Fish, Wildlife, and Parks about the sign and was referred to a Mr. Robert Nagel of the Fish and Wildlife Service stationed at Fort Peck. I could not reach him that day and continued to use the road. Six weeks later I was ticketed 7/10/80 for using

-2-

the road and received said ticket on October 2, 1980. I asked for a hearing and appeared before U.S. Magistrate Gerald Schuster in Wolf Point, Montana on November 14, 1980, Case No. 338093. Ten days later I received notice from Mr. Schusters office that I had been fined $100.00 and had ten days to remit. This incident keeps reminding me of what could be in store for me, my business, and anyone else involved in a similar circumstance.

The taking of rough fish from any water seems to be in accordance with all sport fisherman, and my operation seemed feasable to the Small Business Administration also, as they granted a $70,000 guaranteed SBA loan to erect a new building here on the lake. I feel well assured that the SBA would never have approved the 15 year loan had it known of any restricting conditions on the CMR by the Fish and Wildlife Service, present or future.

In any of the Alternatives are adopted, I feel Alternative A(No Action) is the only one close to harmony for all concerned.

Fort Peck Reservoir being the only real recreation spot in the eastern part of the state, many people feel the water should have more good access than it does, as the roads to the water are very bad up the reservoir. Most are not all weather roads. 2

In closing, my business, (which produces about eighty to one hundred thousand a year to the area economy), is totally dependent on access, and use of the reservoir, located within the CMR. I therefore feel, as do many others involved, that many of the Alternatives are completely out of reason. We can all utilize the CMR without ill effects to one another.

Thanking you for all future considerations. This letter is late due to aforementioned court hearing and results.

Sincerely,

A. Ernest Austin
dba Valley Processing
Box 183
Fort Peck, Montana 59223

AEA:dma

copy:
1. Ron Marlenee
2. Pat Williams
3. John Melcher
4. Max Baucus

Response to Mr. A. Ernest Austin

1. FWS is aware of the commercial fishing on CMR. It is not expected to change in any way by the actions being proposed. The only reference to commercial fishing is the last sentence of paragraph 6, page 45.

2. Several hundred miles of designated roads exist on the refuge. Essentially, the road pattern on CMR will remain the same. A travel map is available at Lewistown, Slippery Ann, Jordan, and Fort Peck headquarters.

EIS Comment on Statement of CMR National Wildlife Refuge

The following comments and questions come from my family and me and do not represent any specific organized group, yet we feel that many of the concerns and values that we hope to emphasize are the same concerns of an increasinly large number of Americans. Like us, a great number of the public does care how federal lands are managed, no matter how distant, and finds areas especially sensitive when these areas are critical to wildlife.

We also would like to note that we have vacationed twice in Montana in the past few years and are familiar with the independent lifestyles and natural beauty of the area in question.

Livestock Issue

After careful examination of the draft EIS, we feel that the major problem facing CMR is the question of how much grazing to allow on the refuge. Following media coverage, we meshed their reports with the facts and projections listed in the EIS to appreciate the pressures and conflicting desires of opposing groups. We studied each alternative and discussed livestock operations with longtime local ranchers in our area. Accordingly, we feel that the issue of grazing has been inflated to represent a threat to the symbolic way of life of the highly-visible and vocal cattlemen of Montana Careful examination of the report shows, however, that even moderate grazing does not meet the basic objectives of the National Wildlife System.

The first objective of the Nat. Wildlife System is to preserve, restore, and enhance "in their natural ecosystems" all endangered or threatened species of animals and plants. Is land that is trampled annually and grazed by herds of domestic animals a natural ecosystem?

In the past, livestock competition reduced necessary vegetation and habitat, contributed to the loss of two herds of bighorn sheep, caused widespread erosion, destroyed riparian ecosystems and depressed wildlife values. Admitedly, CMR is unique and was established under mandate to provide "surplus" forage for domestic animals. The real question to be answered is at what point can livestock graze without harming wildlife potential.

Alternative A---

Livestock concentration areas, particualrly around watering areas, would continue to exhibit soil erosion and watershed quality problems because of poorer range conditions and trampling effects. (pg. 62) Vegetation around ponds would remain inadequate to provide nesting cover for waterfowl. (63) Trampling and consumption of desirable browse species would be extensive. (63) Forage allocations to livestock would continue to depress habitat values for wildlife. (66)

Alternative B---

The proposed action plan has many constraints on livestock use to enhance and rejuvenate the range conditions of CMR. However, the moderate reduction of grazing in this alternative seems calculated to appease political criticism rather than to benefit the wildlife of the refuge. Throughout the report, the benefits of reduced grazing are compared with the present situation, and always a reduction will improve wildlife values. However, this alternative only moderately improves each aspect of the refuge.

According to table 13, page 80, only one of the six critical habitats would be improved to excellent condition twenty years from now. Livestock would continue to endanger vital shrubs (72), disturb wildlife nesting and fawning activties (76) and compete with wildlife for fall-winter forage (76).

Another conflict is that, under this alternative, livestock would be favored on the more level ranges near to water and wildlife are favored on steeper, more

---

inaccessible slopes, or in areas more remote from water. (75) This refuge was made a wildlife refuge partly due to its extensive system of creeks and river habitat, yet this is exactly where the predominate amount of grazing would be focused. Again this alternative does not meet CMR's goal of restoring and maintaining habitat necessary to sustain optimum populations of mammals and non-migratory birds.

Alternative C---

Since grazing would generally be on a prescription basis, grouse pronghorn and mule deer habitat would significantly improve. (82) Virtually all the desired areas on the refuge would approach excellent range condition by the year 2000. (85) The new grazing program with its graze-rest cycle would provide the optimal situation for shrub enhancement. There would also be less impact on cultural reserves since damage by livestock would be reduced.

Alternative D---

This alternative appears extremely unsuited for management of a wildlife refuge. By the year 2000, only waterfowl habitat would be excellent (96). There would be conflict between bighorn sheep and cattle (90) Vegetation in and around ponds would continue to receive heavy livestock use (90). Habitat quality and therefore capability to support wildlife would be increased only slightly over the present situation for most species.

Alternative E--

Although no grazing would return CMR to its primitive natural condition, it would not necessarily be ideal. Rather the loss of prescriptive grazing would eliminate a key tool in the manipulation of sagebrush communities. (99) Also, effects on adjacent lands and political pressures would make this alternative an unlikely selection. However, throughout the consequences section covering this alternative, the benefits of eliminating grazing as they relate to habitat are emphasized. Therefore,..........

Suggestion;

1 Rather than be limited by these rigid alternatives, we suggest the following solution. To begin with, to meet wildlife habitat goals, livestock grazing should be reduced to a level where it is a prescriptive tool and used only to benefit the wildlife range. According to the EIS, that level lies between 23,000 and 30,000 AUM's. This reduced level would definitely effect present livestock operators, although regional economic effects due to grazing changes would be insignificant (30).

Yet any man's livelihood deserves respect and consideration, even if the situation pits the partial incomes of a few families against the public's right to the best wildlife refuge possible.

2 Therefore, those operators who presently have a high percentage of their livestock on the refuge should be the first to receive the limited amount of grazing to be available. Only 15 of the 87 operators are dependent on refuge lands for more than thirty percent of their AUM requirements, only 10 operators get 20-30 percent of their needs from refuge lands.

These ranchers should be offered first options as long as they retain their ranches or operations. As they sell out or retire, then others of the remaining 62 operators who presently use refuge range for a minor ppart of their grazing needs could then take over.

By this reasonable compromise, a maximum amount of the CMR refuge will truly provide excellent cover and food for the widest variety and greatest number of birds and animals. The last remnants of nearly-banished species such as bighorn sheep and peregrine falcons could once again find true refuge from more intensely developed or heavily grazed lands. And perhaps those Americans who take the time and effort to visit this large wildlife retreat, part of out rich national treasure, may actually have the chance to see abundant wildlife rather than just a steady view of grazing cattle.

And yet at the same time, those ranchers who really need their traditional AUM's would be the ones chosen to have their cattle graze at the new levels. No one would be forced out of work, even though sixty of the operators would definitely lose a small amount of grazing potential. And a true commitment to the wildlife goals of the Charles M. Russel National Wildlife Refuge might be set in motion.

Thank you for the change to respond,

Respectfully,

John + Sue + Lara Buckley

John, Sue and Lara Buckley
19740 Tuolumne Road North,
Tuolumne, California
95379

Response to Mr. and Mrs. John Buckley

1. **The Proposed Action is a prescription grazing alternative which is tailored to the habitat needs of each allotment.**
2. **Your suggestion is one alternative. However, FWS has made the decision to meet the needs of wildlife, and then allot any remaining AUMs in the allotment to the current permit holder in the allotment, regardless of how much of their operation is refuge-based.**

30[illegible] East Story
Bozeman, Montana 59715
October 26, 1980

Erwin W. Steucke, Area Mgr.
Fish and Wildlife Service
Federal Bldg., Room 3085
316 North 26 th Street
Billings, Montana 59101

Dear Sir:

I have recently reviewed the draft environmental impact statement on management of the Charles M. Russell Wildlife Refuge in Montana. In general I felt the document was well written. However, I feel compelled to comment as follows and try to clarify some misconceptions implied by the EIS and resultant actions of the U.S. Fish and Wildlife Service.

I was one of the four Range Ecologist that made the range site and condition inventory on approximately 770,000 acres of the C.R in 1977. We were not SCS employees as stated on page 169 of the EIS. All four of us were retired from government service and were hired under private contract to make the range site and condition inventory.

While covering the rangeland thoroughly by pickup, horseback or on foot we delineated the range sites, condition classes, located fences, water developments, and other physical features on aerial photographs. After covering all of the rangeland and completing the above inventory we strongly urged that we four range specialists be designated to complete the project by computing the animal unit months of grazing available in an average year. But, the FWS would not allow us to complete this phase of the inventory even though we were the most intimately acquainted with every parcel of land, grazing patterns, accessibility, etc..

Results of our inventory showed that 85 to 90% of the rangeland on the C.R is in "good" to "excellent" condition. With that high a percentage of range producing near-climax kinds of vegetation it is obvious that the stocking rate of either wildlife or livestock has not been excessive in recent years.

There is very little evidence throughout the entire refuge that reflects overgrazing by livestock or wildlife except for prairie dogs. Nearly all of the "poor" condition range is attributed to prairie dog concentrations.

It has been implied at various times that the proposed cuts in livestock numbers are based on the range site and condition inventory and recommendations of the survey party.

2

I strongly feel that the accessibility cuts suggested by the FWS are far more severe than necessary.

It is true as stated in the lower 3rd of page 135 that "---- large coulee bottoms and extensive ridge tops are primarily livestock areas with the rougher, broken country better suited for wildlife." However, this does not mean that livestock do not or should not use the steeper lands. They do use the rougher land to some extent and if properly managed there is no logical reason, from a rangeland resource standpoint, why they should not be allowed to graze them. Wildlife especially utilize the badlands and rougher landscapes. This is where some of the most nutritious and palatable browse plants grow. They definately have some grazing value.

Distance from water and steepness of slope in relation to accessibility of forage varies greatly from day to day and and season to season and by classes of grazing animals. I suspicion the grazing animals will not always comply with the man-made EIS ruling that there are no AUM's available for livestock on the steeper, rougher lands or distances of more than 1 mile from water.

In the process of making the site and condition inventory we had many opportunities to visit with ranchers whose ranches border the refuge. Most of the ranchers showed an interest in maintaining the high condition range on the refuge and appeared eager to cooperate with the FWS in carrying out rotation grazing systems, water developments and other reasonable range management practices. Many of these practices would also enhance the wildlife habitat.

In closing I would like to reiterate that 85 to 90% of the C.R range is in "good" to "excellent" condition. It could not have been stocked excessively throughout the past years and maintained that high a range condition. I strongly feel the proposed 33% cut in livestock AUM's is unnecessary.

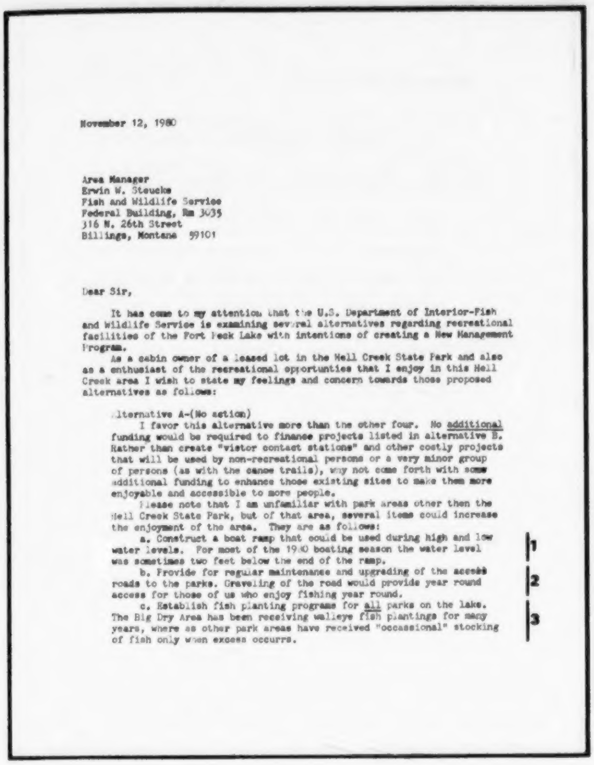
Sincerely,

Robert L. Ross

Robert L. Ross, Range Ecologist

Response to Mr. Robert L. Ross

1. **The text has been amended.**
2. **The FWS does not intend to imply that there are no AUMs on steeper lands or at distances from water. What we do indicate is that cattle do not regularly utilize these areas; therefore, they will not be considered in figuring AUMs available for livestock.**
3. **Range condition and wildlife habitat condition are not synonomous.**



November 12, 1980

Area Manager
Erwin W. Steucke
Fish and Wildlife Service
Federal Building, Rm 3035
316 N. 26th Street
Billings, Montana 59101

Dear Sir,

It has come to my attention that the U.S. Department of Interior-Fish and Wildlife Service is examining several alternatives regarding recreational facilities of the Fort Peck Lake with intentions of creating a New Management Program.

As a cabin owner of a leased lot in the Hell Creek State Park and also as a enthusiast of the recreational opportunties that I enjoy in this Hell Creek area I wish to state my feelings and concern towards those proposed alternatives as follows:

Alternative A-(No action)

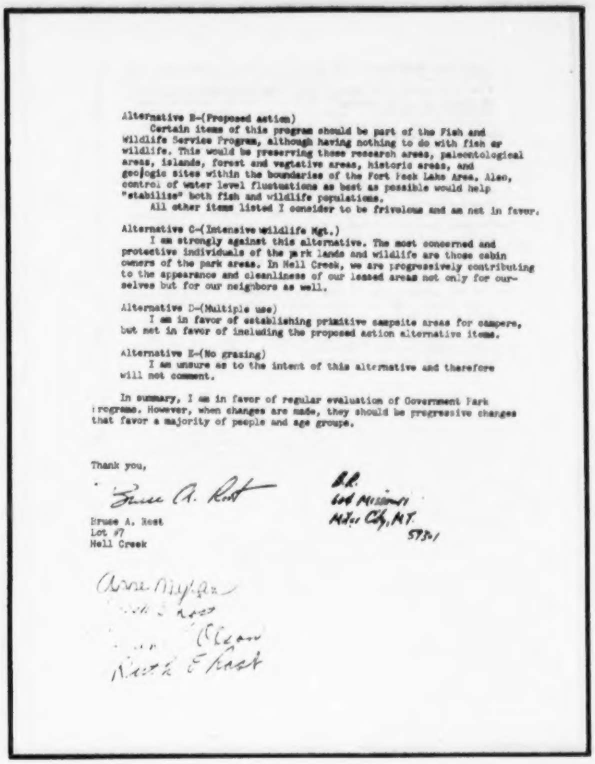
I favor this alternative more than the other four. No additional funding would be required to finance projects listed in alternative B. Rather than create "vistor contact stations" and other costly projects that will be used by non-recreational persons or a very minor group of persons (as with the canoe trails), why not come forth with some additional funding to enhance those existing sites to make them more enjoyable and accessible to more people.

Please note that I am unfamiliar with park areas other then the Hell Creek State Park, but of that area, several items could increase the enjoyment of the area. They are as follows:

a. Construct a boat ramp that could be used during high and low water levels. For most of the 1980 boating season the water level was sometimes two feet below the end of the ramp. 1

b. Provide for regular maintenanse and upgrading of the access roads to the parks. Graveling of the road would provide year round access for those of us who enjoy fishing year round. 2

c. Establish fish planting programs for all parks on the lake. The Big Dry Area has been receiving walleye fish plantings for many years, where as other park areas have received "occassional" stocking of fish only when excess occurrs. 3



Alternative B-(Proposed action)

Certain items of this program should be part of the Fish and Wildlife Service Program, although having nothing to do with fish or wildlife. This would be preserving those research areas, paleontological areas, islands, forest and vegtative areas, historic areas, and geologic sites within the boundaries of the Fort Peck Lake Area. Also, control of water level flustuations as best as possible would help "stabilize" both fish and wildlife populations.

All other items listed I consider to be frivolous and am not in favor.

Alternative C-(Intensive wildlife Mgt.)

I am strongly against this alternative. The most concerned and protective individuals of the park lands and wildlife are those cabin owners of the park areas. In Hell Creek, we are progressively contributing to the appearance and cleanliness of our leased areas not only for ourselves but for our neighbors as well.

Alternative D-(Multiple use)

I am in favor of establishing primitive campsite areas for campers, but not in favor of including the proposed action alternative items.

Alternative E-(No grazing)

I am unsure as to the intent of this alternative and therefore will not comment.

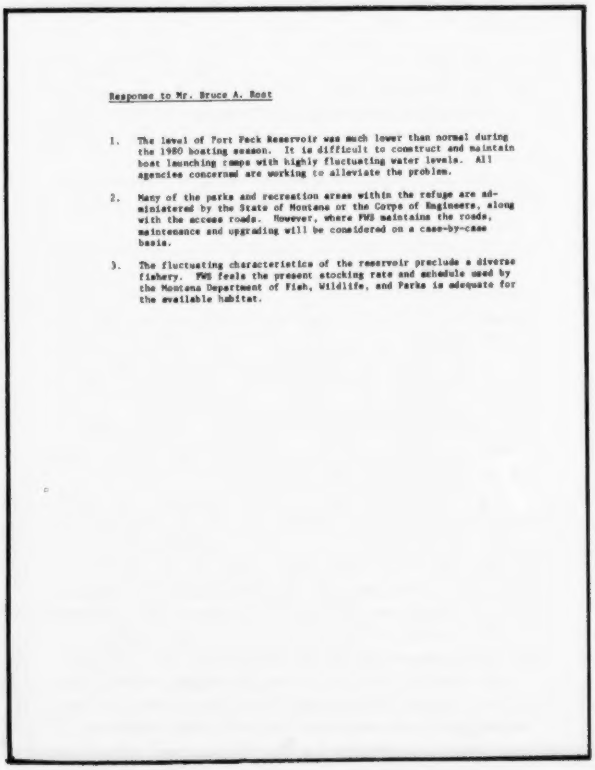
In summary, I am in favor of regular evaluation of Government Park programs. However, when changes are made, they should be progressive changes that favor a majority of people and age groups.

Thank you,

Bruce A. Rost

Bruce A. Rost
Lot #7
Hell Creek

B.R.
604 Missouri
Miles City, MT.
59301

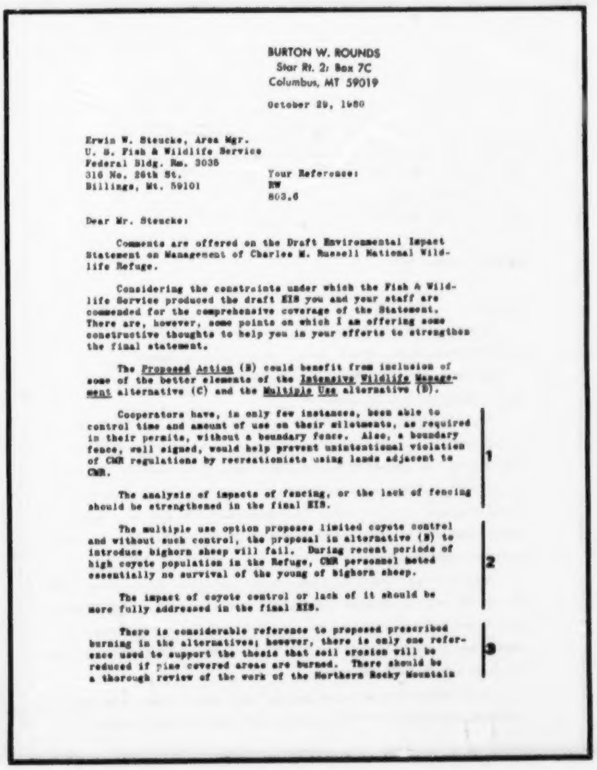


Response to Mr. Bruce A. Rost

1. The level of Fort Peck Reservoir was much lower than normal during the 1980 boating season. It is difficult to construct and maintain boat launching ramps with highly fluctuating water levels. All agencies concerned are working to alleviate the problem.

2. Many of the parks and recreation areas within the refuge are administered by the State of Montana or the Corps of Engineers, along with the access roads. However, where FWS maintains the roads, maintenance and upgrading will be considered on a case-by-case basis.

3. The fluctuating characteristics of the reservoir preclude a diverse fishery. FWS feels the present stocking rate and schedule used by the Montana Department of Fish, Wildlife, and Parks is adequate for the available habitat.



BURTON W. ROUNDS
Star Rt. 2; Box 7C
Columbus, MT 59019

October 29, 1980

Erwin W. Steucke, Area Mgr.
U. S. Fish & Wildlife Service
Federal Bldg. Rm. 3035
316 No. 26th St.
Billings, Mt. 59101

Your Reference:
RW
803.6

Dear Mr. Steucke:

Comments are offered on the Draft Environmental Impact Statement on Management of Charles M. Russell National Wildlife Refuge.

Considering the constraints under which the Fish & Wildlife Service produced the draft EIS you and your staff are commended for the comprehensive coverage of the Statement. There are, however, some points on which I am offering some constructive thoughts to help you in your efforts to strengthen the final statement.

The Proposed Action (B) could benefit from inclusion of some of the better elements of the Intensive Wildlife Management alternative (C) and the Multiple Use alternative (D).

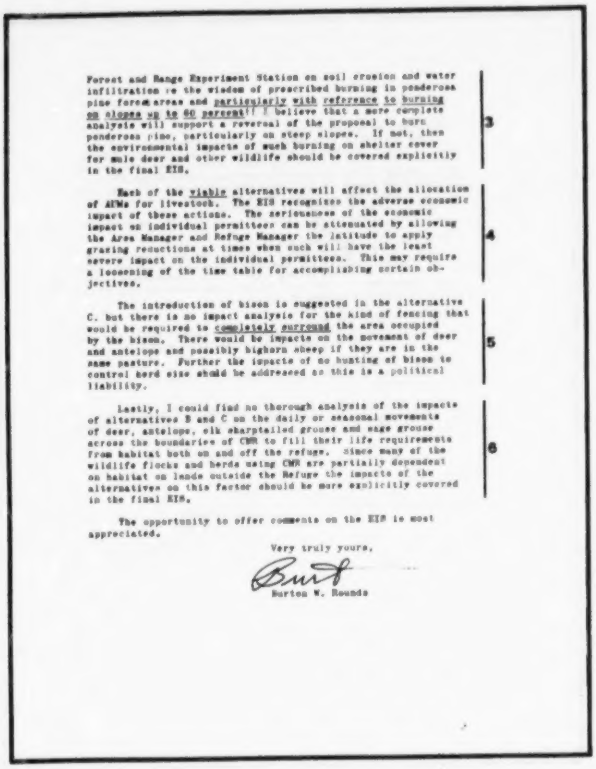
Cooperators have, in only few instances, been able to control time and amount of use on their allotments, as required in their permits, without a boundary fence. Also, a boundary fence, well signed, would help prevent unintentional violation of CMR regulations by recreationists using lands adjacent to CMR. 1

The analysis of impacts of fencing, or the lack of fencing should be strengthened in the final EIS.

The multiple use option proposes limited coyote control and without such control, the proposal in alternative (B) to introduce bighorn sheep will fail. During recent periods of high coyote population in the Refuge, CMR personnel noted essentially no survival of the young of bighorn sheep. 2

The impact of coyote control or lack of it should be more fully addressed in the final EIS.

There is considerable reference to proposed prescribed burning in the alternatives; however, there is only one reference used to support the thesis that soil erosion will be reduced if pine covered areas are burned. There should be a thorough review of the work of the Northern Rocky Mountain 3



Forest and Range Experiment Station on soil erosion and water infiltration re the wisdom of prescribed burning in ponderosa pine forest areas and particularly with reference to burning on slopes up to 60 percent!! I believe that a more complete analysis will support a reversal of the proposal to burn ponderosa pine, particularly on steep slopes. If not, then the environmental impacts of such burning on shelter cover for mule deer and other wildlife should be covered explicitly in the final EIS. 3

Each of the viable alternatives will affect the allocation of AUMs for livestock. The EIS recognizes the adverse economic impact of these actions. The seriousness of the economic impact on individual permittees can be attenuated by allowing the Area Manager and Refuge Manager the latitude to apply grazing reductions at times when such will have the least severe impact on the individual permittees. This may require a loosening of the time table for accomplishing certain objectives. 4

The introduction of bison is suggested in the alternative C. but there is no impact analysis for the kind of fencing that would be required to completely surround the area occupied by the bison. There would be impacts on the movement of deer and antelope and possibly bighorn sheep if they are in the same pasture. Further the impacts of no hunting of bison to control herd size should be addressed as this is a political liability. 5

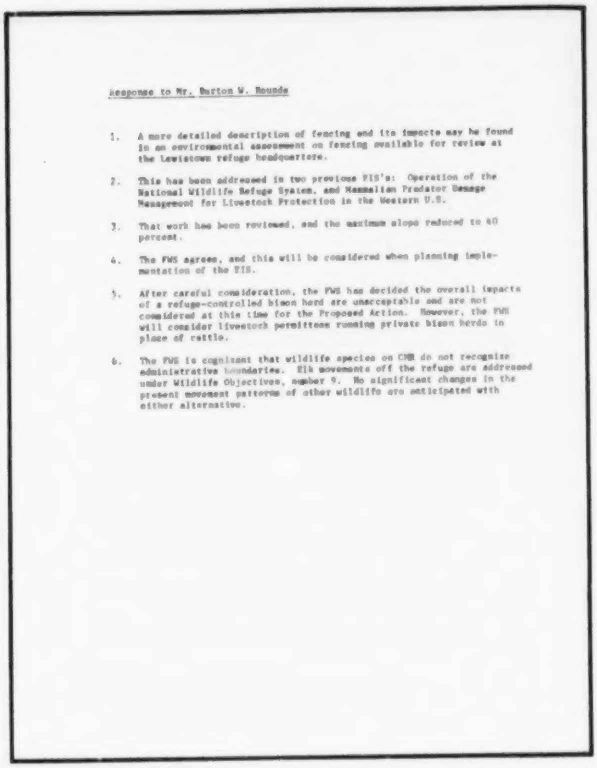
Lastly, I could find no thorough analysis of the impacts of alternatives B and C on the daily or seasonal movements of deer, antelope, elk sharptailed grouse and sage grouse across the boundaries of CMR to fill their life requirements from habitat both on and off the refuge. Since many of the wildlife flocks and herds using CMR are partially dependent on habitat on lands outside the Refuge the impacts of the alternatives on this factor should be more explicitly covered in the final EIS. 6

The opportunity to offer comments on the EIS is most appreciated.

Very truly yours,

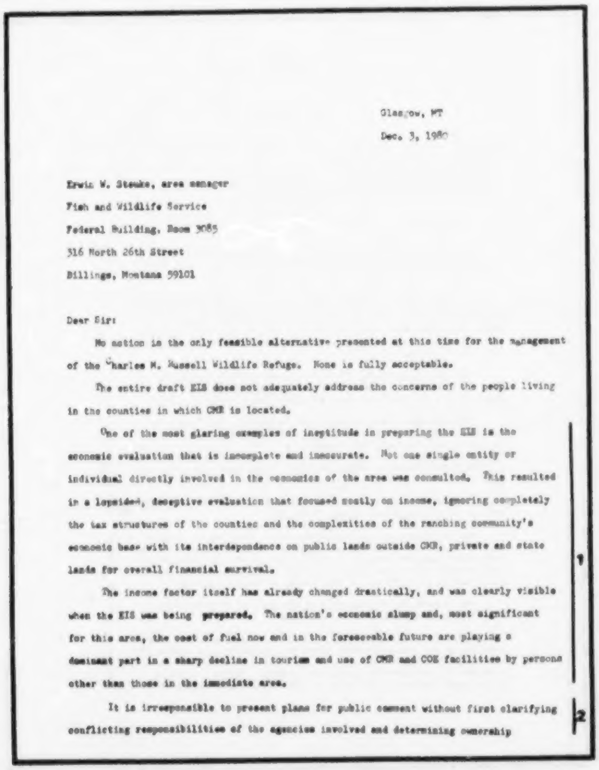
Burt

Burton W. Rounds



Response to Mr. Burton W. Rounds

1. A more detailed description of fencing and its impacts may be found in an environmental assessment on fencing available for review at the Lewistown refuge headquarters.
2. This has been addressed in two previous EIS's: Operation of the National Wildlife Refuge System, and Mammalian Predator Damage Management for Livestock Protection in the Western U.S.
3. That work has been reviewed, and the maximum slope reduced to 40 percent.
4. The FWS agrees, and this will be considered when planning implementation of the EIS.
5. After careful consideration, the FWS has decided the overall impacts of a refuge-controlled bison herd are unacceptable and are not considered at this time for the Proposed Action. However, the FWS will consider livestock permittees running private bison herds in place of cattle.
6. The FWS is cognizant that wildlife species on CMR do not recognize administrative boundaries. Elk movements off the refuge are addressed under Wildlife Objectives, number 9. No significant changes in the present movement patterns of other wildlife are anticipated with either alternative.



Glasgow, MT

Dec. 3, 1980

Erwin W. Steuke, area manager
Fish and Wildlife Service
Federal Building, Room 3035
316 North 26th Street
Billings, Montana 59101

Dear Sir:

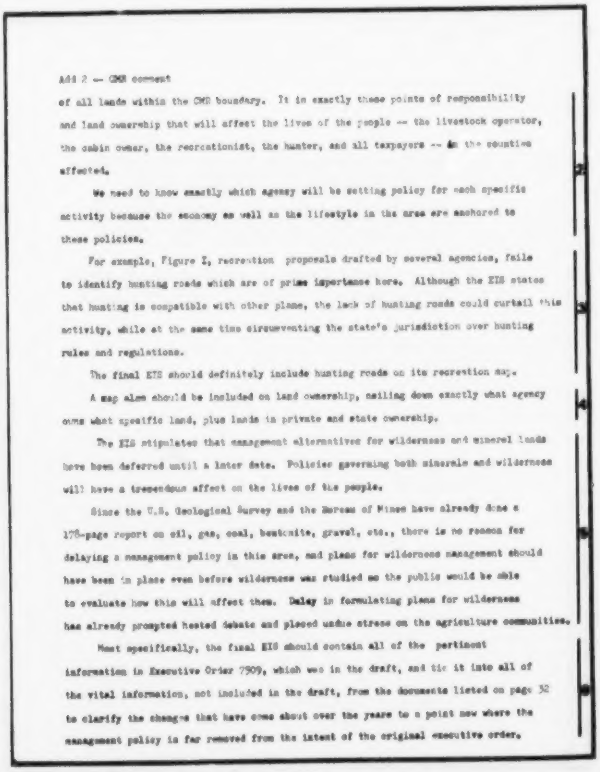
No action is the only feasible alternative presented at this time for the management of the Charles M. Russell Wildlife Refuge. None is fully acceptable.

The entire draft EIS does not adequately address the concerns of the people living in the counties in which CMR is located.

One of the most glaring examples of ineptitude in preparing the EIS is the economic evaluation that is incomplete and inaccurate. Not one single entity or individual directly involved in the economics of the area was consulted. This resulted in a lopsided, deceptive evaluation that focused mostly on income, ignoring completely the tax structures of the counties and the complexities of the ranching community's economic base with its interdependence on public lands outside CMR, private and state lands for overall financial survival. 1

The income factor itself has already changed drastically, and was clearly visible when the EIS was being prepared. The nation's economic slump and, most significant for this area, the cost of fuel now and in the foreseeable future are playing a dominant part in a sharp decline in tourism and use of CMR and COE facilities by persons other than those in the immediate area.

It is irresponsible to present plans for public comment without first clarifying conflicting responsibilities of the agencies involved and determining ownership 2



Add 2 — CMR comment

of all lands within the CMR boundary. It is exactly these points of responsibility and land ownership that will affect the lives of the people — the livestock operator, the cabin owner, the recreationist, the hunter, and all taxpayers -- in the counties affected. 2

We need to know exactly which agency will be setting policy for each specific activity because the economy as well as the lifestyle in the area are anchored to these policies.

For example, Figure I, recreation proposals drafted by several agencies, fails to identify hunting roads which are of prime importance here. Although the EIS states that hunting is compatible with other plans, the lack of hunting roads could curtail this activity, while at the same time circumventing the state's jurisdiction over hunting rules and regulations. 3

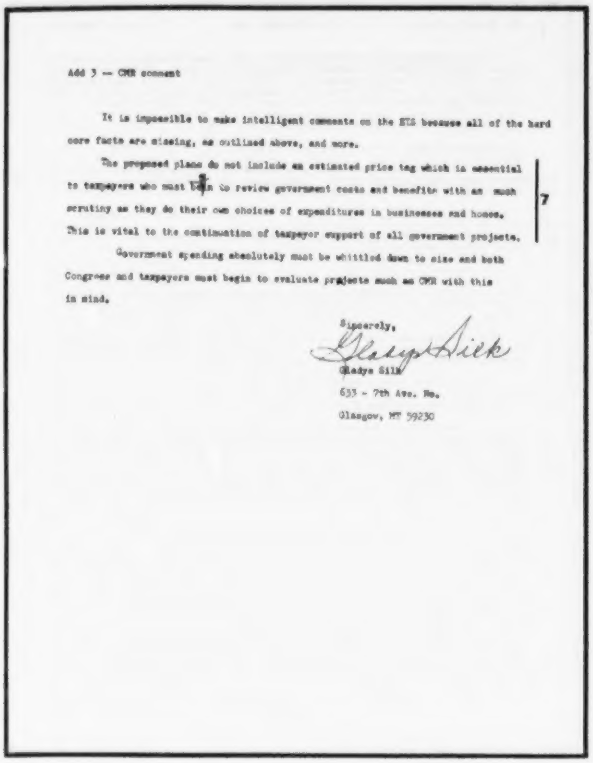
The final EIS should definitely include hunting roads on its recreation map.

A map also should be included on land ownership, nailing down exactly what agency owns what specific land, plus lands in private and state ownership. 4

The EIS stipulates that management alternatives for wilderness and mineral lands have been deferred until a later date. Policies governing both minerals and wilderness will have a tremendous affect on the lives of the people.

Since the U.S. Geological Survey and the Bureau of Mines have already done a 178-page report on oil, gas, coal, bentonite, gravel, etc., there is no reason for delaying a management policy in this area, and plans for wilderness management should have been in place even before wilderness was studied so the public would be able to evaluate how this will affect them. Delay in formulating plans for wilderness has already prompted heated debate and placed undue stress on the agriculture communities. 5

Most specifically, the final EIS should contain all of the pertinent information in Executive Order 7509, which was in the draft, and tie it into all of the vital information, not included in the draft, from the documents listed on page 32 to clarify the changes that have come about over the years to a point now where the management policy is far removed from the intent of the original executive order. 6



Add 3 — CMR comment

It is impossible to make intelligent comments on the EIS because all of the hard core facts are missing, as outlined above, and more.

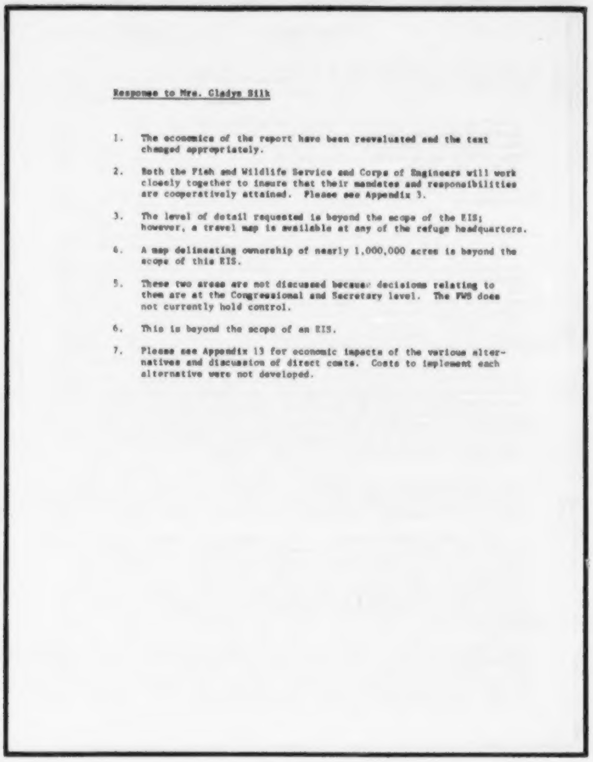
The proposed plans do not include an estimated price tag which is essential to taxpayers who must begin to review government costs and benefits with as much scrutiny as they do their own choices of expenditures in businesses and homes. This is vital to the continuation of taxpayer support of all government projects. 7

Government spending absolutely must be whittled down to size and both Congress and taxpayers must begin to evaluate projects such as CMR with this in mind.

Sincerely,

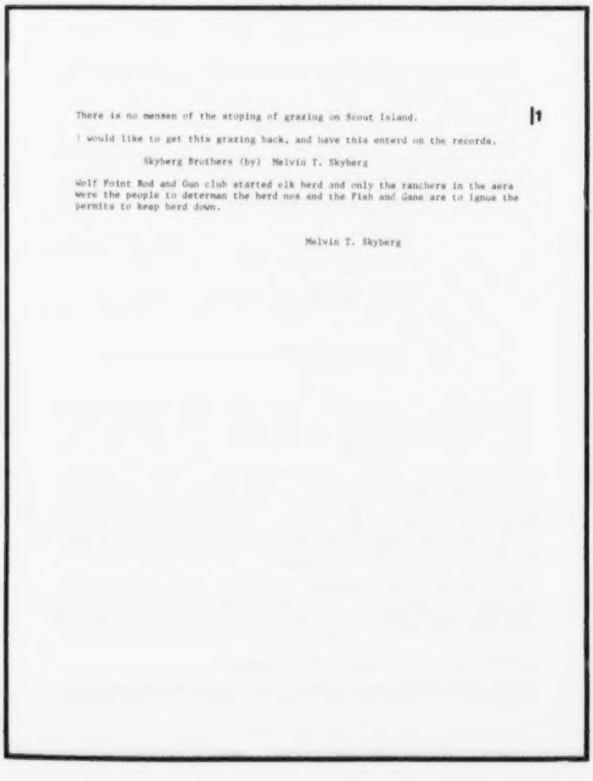
Gladys Silk

Gladys Silk
633 - 7th Ave. No.
Glasgow, MT 59230



Response to Mrs. Gladys Silk

1. The economics of the report have been reevaluated and the text changed appropriately.
2. Both the Fish and Wildlife Service and Corps of Engineers will work closely together to insure that their mandates and responsibilities are cooperatively attained. Please see Appendix 3.
3. The level of detail requested is beyond the scope of the EIS; however, a travel map is available at any of the refuge headquarters.
4. A map delineating ownership of nearly 1,000,000 acres is beyond the scope of this EIS.
5. These two areas are not discussed because decisions relating to them are at the Congressional and Secretary level. The FWS does not currently hold control.
6. This is beyond the scope of an EIS.
7. Please see Appendix 13 for economic impacts of the various alternatives and discussion of direct costs. Costs to implement each alternative were not developed.



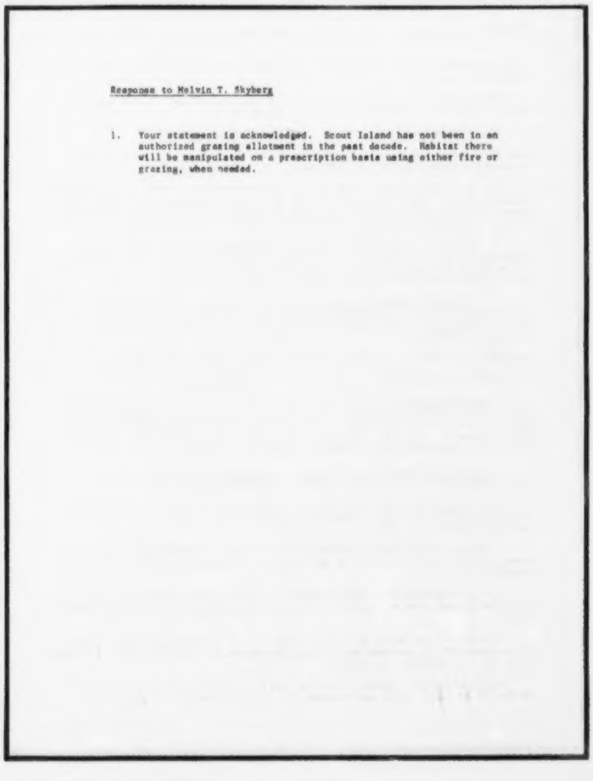
There is no mensen of the stoping of grazing on Scout Island. 1

I would like to get this grazing back, and have this enterd on the records.

Skyberg Brothers (by) Melvin T. Skyberg

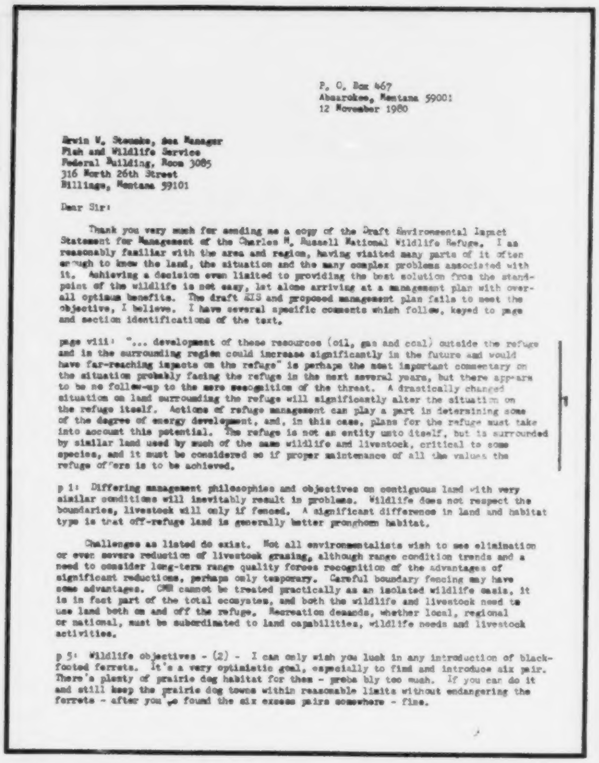
Wolf Point Rod and Gun club started elk herd and only the ranchers in the aera were the people to determan the herd nos and the Fish and Gane are to ignue the permits to keep herd down.

Melvin T. Skyberg



Response to Melvin T. Skyberg

1. Your statement is acknowledged. Scout Island has not been in an authorized grazing allotment in the past decade. Habitat there will be manipulated on a prescription basis using either fire or grazing, when needed.



P. O. Box 467
Absarokee, Montana 59001
12 November 1980

Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3085
316 North 26th Street
Billings, Montana 59101

Dear Sir:

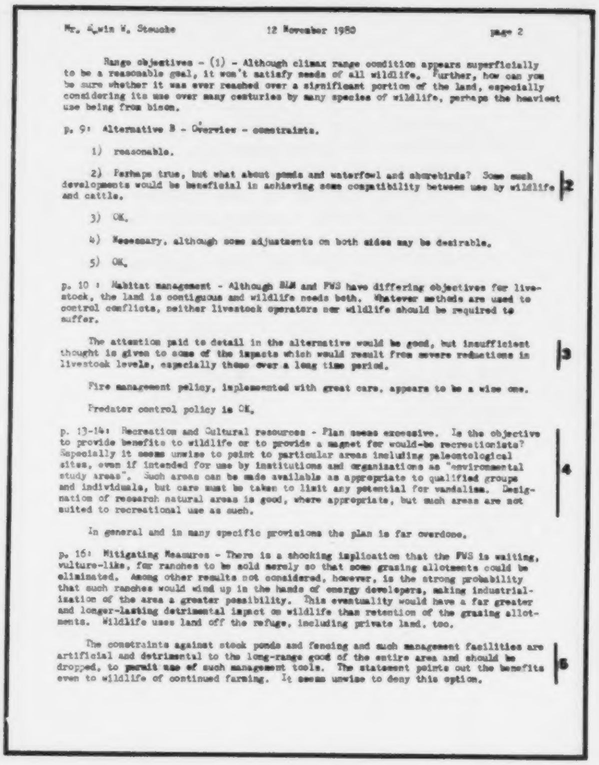
Thank you very much for sending me a copy of the Draft Environmental Impact Statement for Management of the Charles M. Russell National Wildlife Refuge. I am reasonably familiar with the area and region, having visited many parts of it often enough to know the land, the situation and the many complex problems associated with it. Achieving a decision even limited to providing the best solution from the standpoint of the wildlife is not easy, let alone arriving at a management plan with overall optimum benefits. The draft EIS and proposed management plan fails to meet the objective, I believe. I have several specific comments which follow, keyed to page and section identifications of the text.

page viii: "... development of these resources (oil, gas and coal) outside the refuge and in the surrounding region could increase significantly in the future and would have far-reaching impacts on the refuge" is perhaps the most important commentary on the situation probably facing the refuge in the next several years, but there appears to be no follow-up to the mere recognition of the threat. A drastically changed situation on land surrounding the refuge will significantly alter the situation on the refuge itself. Actions of refuge management can play a part in determining some of the degree of energy development, and, in this case, plans for the refuge must take into account this potential. The refuge is not an entity unto itself, but is surrounded by similar land used by much of the same wildlife and livestock, critical to some species, and it must be considered so if proper maintenance of all the values the refuge offers is to be achieved. 1

p 1: Differing management philosophies and objectives on contiguous land with very similar conditions will inevitably result in problems. Wildlife does not respect the boundaries, livestock will only if fenced. A significant difference in land and habitat type is that off-refuge land is generally better pronghorn habitat.

Challenges as listed do exist. Not all environmentalists wish to see elimination or even severe reduction of livestock grazing, although range condition trends and a need to consider long-term range quality forces recognition of the advantages of significant reductions, perhaps only temporary. Careful boundary fencing may have some advantages. CMR cannot be treated practically as an isolated wildlife oasis, it is in fact part of the total ecosystem, and both the wildlife and livestock need to use land both on and off the refuge. Recreation demands, whether local, regional or national, must be subordinated to land capabilities, wildlife needs and livestock activities.

p 5: Wildlife objectives - (2) - I can only wish you luck in any introduction of black-footed ferrets. It's a very optimistic goal, especially to find and introduce six pair. There's plenty of prairie dog habitat for them - proba bly too much. If you can do it and still keep the prairie dog towns within reasonable limits without endangering the ferrets - after you've found the six excess pairs somewhere - fine.



Range objectives - (1) - Although climax range condition appears superficially to be a reasonable goal, it won't satisfy needs of all wildlife. Further, how can you be sure whether it was ever reached over a significant portion of the land, especially considering its use over many centuries by many species of wildlife, perhaps the heaviest use being from bison.

p. 9: Alternative B - Overview - constraints.

1) reasonable.

2) Perhaps true, but what about ponds and waterfowl and shorebirds? Some such developments would be beneficial in achieving some compatibility between use by wildlife and cattle. 2

3) OK.

4) Necessary, although some adjustments on both sides may be desirable.

5) OK.

p. 10 : Habitat management - Although BLM and FWS have differing objectives for livestock, the land is contiguous and wildlife needs both. Whatever methods are used to control conflicts, neither livestock operators nor wildlife should be required to suffer.

The attention paid to detail in the alternative would be good, but insufficient thought is given to some of the impacts which would result from severe reductions in livestock levels, especially those over a long time period. 3

Fire management policy, implemented with great care, appears to be a wise one.

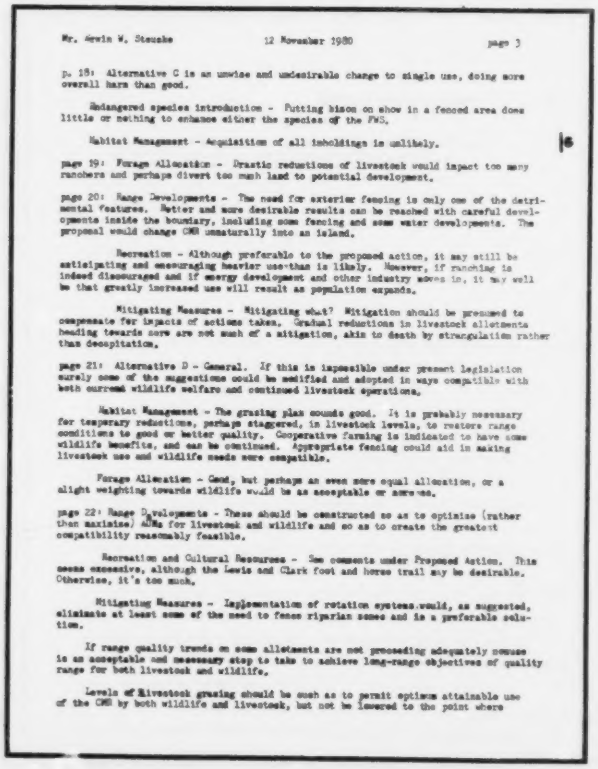
Predator control policy is OK.

p. 13-14: Recreation and Cultural resources - Plan seems excessive. Is the objective to provide benefits to wildlife or to provide a magnet for would-be recreationists? Especially it seems unwise to point to particular areas including paleontological sites, even if intended for use by institutions and organizations as "environmental study areas". Such areas can be made available as appropriate to qualified groups and individuals, but care must be taken to limit any potential for vandalism. Designation of research natural areas is good, where appropriate, but such areas are not suited to recreational use as such. 4

In general and in many specific provisions the plan is far overdone.

p. 16: Mitigating Measures - There is a shocking implication that the FWS is waiting, vulture-like, for ranches to be sold merely so that some grazing allotments could be eliminated. Among other results not considered, however, is the strong probability that such ranches would wind up in the hands of energy developers, making industrialization of the area a greater possibility. This eventuality would have a far greater and longer-lasting detrimental impact on wildlife than retention of the grazing allotments. Wildlife uses land off the refuge, including private land, too.

The constraints against stock ponds and fencing and such management facilities are artificial and detrimental to the long-range good of the entire area and should be dropped, to permit use of such management tools. The statement points out the benefits even to wildlife of continued farming. It seems unwise to deny this option. 5



p. 18: Alternative C is an unwise and undesirable change to single use, doing more overall harm than good.

Endangered species introduction - Putting bison on show in a fenced area does little or nothing to enhance either the species or the FWS.

Habitat Management - Acquisition of all inholdings is unlikely. 6

page 19: Forage Allocation - Drastic reductions of livestock would impact too many ranchers and perhaps divert too much land to potential development.

page 20: Range Developments - The need for exterior fencing is only one of the detrimental features. Better and more desirable results can be reached with careful developments inside the boundary, including some fencing and some water developments. The proposal would change CMR unnaturally into an island.

Recreation - Although preferable to the proposed action, it may still be anticipating and encouraging heavier use than is likely. However, if ranching is indeed discouraged and if energy development and other industry moves in, it may well be that greatly increased use will result as population expands.

Mitigating Measures - Mitigating what? Mitigation should be presumed to compensate for impacts of actions taken. Gradual reductions in livestock allotments heading towards zero are not much of a mitigation, akin to death by strangulation rather than decapitation.

page 21: Alternative D - General. If this is impossible under present legislation surely some of the suggestions could be modified and adopted in ways compatible with both current wildlife welfare and continued livestock operations.

Habitat Management - The grazing plan sounds good. It is probably necessary for temporary reductions, perhaps staggered, in livestock levels, to restore range conditions to good or better quality. Cooperative farming is indicated to have some wildlife benefits, and can be continued. Appropriate fencing could aid in making livestock use and wildlife needs more compatible.

Forage Allocation - Good, but perhaps an even more equal allocation, or a slight weighting towards wildlife would be as acceptable or more so.

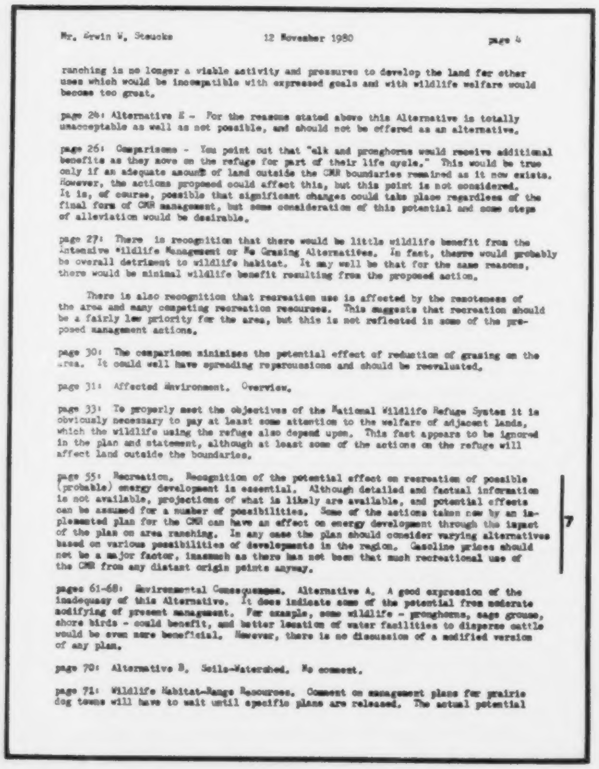
page 22: Range Developments - These should be constructed so as to optimize (rather than maximize) AUMs for livestock and wildlife and so as to create the greatest compatibility reasonably feasible.

Recreation and Cultural Resources - See comments under Proposed Action. This seems excessive, although the Lewis and Clark foot and horse trail may be desirable. Otherwise, it's too much.

Mitigating Measures - Implementation of rotation systems would, as suggested, eliminate at least some of the need to fence riparian zones and is a preferable solution.

If range quality trends on some allotments are not proceeding adequately nonuse is an acceptable and necessary step to take to achieve long-range objectives of quality range for both livestock and wildlife.

Levels of livestock grazing should be such as to permit optimum attainable use of the CMR by both wildlife and livestock, but not be lowered to the point where



ranching is no longer a viable activity and pressures to develop the land for other uses which would be incompatible with expressed goals and with wildlife welfare would become too great.

page 24: Alternative E - For the reasons stated above this Alternative is totally unacceptable as well as not possible, and should not be offered as an alternative.

page 26: Comparisons - You point out that "elk and pronghorns would receive additional benefits as they move on the refuge for part of their life cycle." This would be true only if an adequate amount of land outside the CMR boundaries remained as it now exists. However, the actions proposed could affect this, but this point is not considered. It is, of course, possible that significant changes could take place regardless of the final form of CMR management, but some consideration of this potential and some steps of alleviation would be desirable.

page 27: There is recognition that there would be little wildlife benefit from the Intensive Wildlife Management or No Grazing Alternatives. In fact, there would probably be overall detriment to wildlife habitat. It may well be that for the same reasons, there would be minimal wildlife benefit resulting from the proposed action.

There is also recognition that recreation use is affected by the remoteness of the area and many competing recreation resources. This suggests that recreation should be a fairly low priority for the area, but this is not reflected in some of the proposed management actions.

page 30: The comparison minimizes the potential effect of reduction of grazing on the area. It could well have spreading repercussions and should be reevaluated.

page 31: Affected Environment. Overview.

page 33: To properly meet the objectives of the National Wildlife Refuge System it is obviously necessary to pay at least some attention to the welfare of adjacent lands, which the wildlife using the refuge also depend upon. This fact appears to be ignored in the plan and statement, although at least some of the actions on the refuge will affect land outside the boundaries.

page 55: Recreation. Recognition of the potential effect on recreation of possible (probable) energy development is essential. Although detailed and factual information is not available, projections of what is likely are available, and potential effects can be assumed for a number of possibilities. Some of the actions taken now by an implemented plan for the CMR can have an effect on energy development through the impact of the plan on area ranching. In any case the plan should consider varying alternatives based on various possibilities of developments in the region. Gasoline prices should not be a major factor, inasmuch as there has not been that much recreational use of the CMR from any distant origin points anyway. 7

pages 61-68: Environmental Consequences. Alternative A. A good expression of the inadequacy of this Alternative. It does indicate some of the potential from moderate modifying of present management. For example, some wildlife - pronghorns, sage grouse, shore birds - could benefit, and better location of water facilities to disperse cattle would be even more beneficial. However, there is no discussion of a modified version of any plan.

page 70: Alternative B. Soils-Watershed. No comment.

page 71: Wildlife Habitat-Range Resources. Comment on management plans for prairie dog towns will have to wait until specific plans are released. The actual potential for black-footed ferrets seems slight, although probably desirable. The need for control of expansion of the towns could cause problems if and when ferrets are located and introduced.

Reducing livestock grazing as substantially as proposed would benefit some wildlife species but not others. As mentioned earlier some would benefit from continued grazing. This is not made clear in discussion of the impacts of this alternative.

page 74: Wildlife habitat off the Refuge would probably decrease or even disappear if severely impacted ranchers were forced to sell out. This potential should be considered. Energy development - oil and gas, coal, synfuel, etc. - is likely in the region, and use of Fort Peck water is proposed. Such developments and related impacts are more likely if livestock operations become more marginal.

Areas having rotation systems of livestock grazing "would not have significant distribution problems." Other advantages referred to here and elsewhere in the Plan suggest full consideration of implementing such systems on a wider basis could be a valid Alternative. This Alternative is proposing very light livestock grazing rather than moderate stocking, but the discussion suggests moderate grazing meets many of the stated objectives, and could reduce the severity of the impact on livestock operators. 8

page 77-78: Minimal consideration of the effects on wildlife of the forecast greatly increased human visitation due to improved access is provided. It may well be that such an increase in human use will not occur, because of the gasoline supply and cost situation, but if it does, a better consideration of what impact it will have on the welfare of wildlife is needed. It is suggested that increased roading and use of roads is detrimental to elk, for example. Further discussion of such factors is needed. If the use isn't going to increase, then facilities need not be built. If increased use levels are not desirable they should not be encouraged. 9

page 78: The "slight increase" in AUMs from 1985-2000 is illusory. It would be merely a change from privately owned land to federal ownership, and not increase livestock forage. 10

page 79: There is no consideration of what may happen if livestock operators are forced out of business. Although each situation is individual and privileged some general assumptions can be made, and should be. The fate of land adjacent to and outside CMR will have a significant effect on the Refuge, and various possibilities must be considered in any Plan in order to arrive at an optimum solution for the many conflicting needs and objectives. 11

page 81: Alternative C.

page 82: Use of "prescription" livestock grazing as a tool would not be the answer to habitat limitations for all species, but would only help provide some additional food and cover for specific species.

Although elimination of most cattle grazing would increase the supply of forbs for pronghorns and mule deer, as pointed out elsewhere in the EIS, cattle grazing does tend to favor sagebrush, an essential for pronghorn (one of the primary species for which the area was originally set aside) and other species. This is recognized in the list of consequences, which does point out both good and bad from cattle utilization, and suggests minimal use by livestock as a partial answer.

Only cursory consideration of the impact of this and other alternatives on area ranchers is provided, as mentioned earlier in my comments.

page 86: Bison contained in fenced areas should not be considered as restoring a sight familiar in the area in the 1800s.

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page 87: The section on Socio-Economics would be an appropriate place for consideration of what could be called a "multiplier effect" of the reduction in AUMs available to the local ranchers. The impact would be much greater than the direct monetary loss of the specific AUMs.

page 89: Alternative D: The increased soil erosion and reduction in quality forecast as a result of implementing this alternative is attributed, with good justification, to the recreation proposals contained in the Alternative. It would be reasonable to drastically modify that part of the Alternative, retaining much of the remainder. Such an approach should be fully considered.

page 90: It is obviously true that there would be fewer potential dens for black-footed ferrets, but unless all prairie dog towns were eliminated - not what is being suggested - it is not true that all potential dens would be eliminated.

Maintenance or slight expansion of sage communities could well be a major objective, as it would directly benefit pronghorn, a key wildlife species on CMR.

Riparian areas receiving too heavy use by livestock would presumably be fenced or subjected to other appropriate controls and undesired effects could be minimized.

page 93: Direct conflicts between recreationists and wildlife and increased disturbance of wildlife habitat by recreation developments would appear to be far more significant than any impacts resulting from livestock use. This is additional reason for a full consideration of an alternative minimizing recreational developments such as now proposed in this Alternative, but continuing livestock operations on a level approximating that proposed by this Alternative.

page 94: The reductions in AUMs proposed by this Alternative seem unavoidable when long-term range quality is considered. If livestock operations are to continue into the next century as a healthy activity depleted range condition must be overcome and rehabilitation undertaken. The benefits of doing this will over the years compensate for temporary hardship and that is preferable to continued slow degradation which would eventually require abandonment of grazing altogether, destroying any values for either livestock (and ranchers) or wildlife. It may be possible and would be desirable to mitigate the impact on two individuals (and this would be a far simpler task than to do so for the many impacted under the other alternatives).

page 97: Alternative E: It should be noted that the accumulated litter could be an extreme fire hazard rather than merely a possible one because of the frequent summer lightning storms.

page 102-103: Comments expressed by me elsewhere regarding the effects of reduced livestock grazing apply here as well, and obviously to a much greater extent.

It is clear, and is specifically pointed out in the discussions under the various Alternatives, that no one action will improve habitat for all species. Rather, each and every particular action will benefit some and be detrimental to others. If it is not possible to develop an ideal Alternative the goal should be optimum balanced benefit for all. It is important to mention human life styles of the area and to try to continue activities which over the past 100 years have been able to co-exist with wildlife. Past excesses that have been detrimental can be corrected. They have not destroyed habitat in spite of some damage. Potential changes now threatening would not be compatible with any wildlife, and this factor needs to be considered.

In conclusion, I wish to recommend development of another alternative, closer to the Multiple Use alternative described, with considerably reduced emphasis on the

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expansion of recreation. A good balance between meeting the needs of wildlife and those of livestock on the CMR would be beneficial to the lands surrounding the Refuge, making possible the maintenance and improvement of quality there. This would reflect back to the Refuge and insure reasonably good conditions there too, helping to avoid the dangers which would result from excessive developments nearby. Although perhaps not ideal from anyone's standpoint, such a policy would probably be the best compromise policy and the one most likely to retain the overall quality of the region. The Refuge alone can never be sufficient to maintain the wildlife and its habitat. I believe that a modified Multiple Use policy would have a much better chance of succeeding.

I have pointed out the deficiencies I find in the Draft Environmental Impact Statement. I hope that they can be corrected in the final version, and that the management plan finally adopted will be closer to that I suggest. I appreciate the opportunity to comment and will look forward to receiving the final version of the EIS and Management Plan.

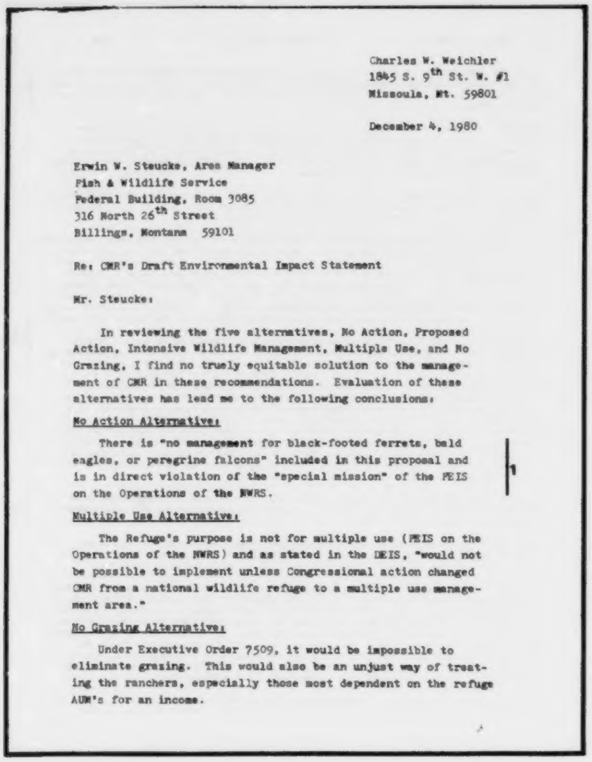
Sincerely,

Francis J. Walcott

Francis J. Walcott

Response to Francis J. Walcott

1. The development of and changes from the potential development of oil, gas, and coal in the surrounding region are only speculative at this time and are not addressed for that reason. Although actions on refuge lands can influence management on nearby lands, the refuge can only directly control refuge lands, and for that reason, management emphasis is placed on those lands.
2. Although water development would be used by wildlife, it is not necessary for most CMR wildlife species and would only serve to distribute cattle into areas now used and needed by wildlife. CMR terrain is such that very few water developments would provide good habitat for waterfowl and shorebirds.
3. The economic situation has been reevaluated and the text revised.
4. The section described the management actions that will occur in Recreational and Cultural Resources as funding, manpower, and demand warrant, providing no conflicts with wildlife are apparent. It is a Service goal to provide compatible recreation on Service lands where adequate funding exists and a need has been documented. All legislation concerning the management and protection of cultural resources will be adhered to.
5. See response #2 above.
6. See revised text. Not all inholdings need be acquired for this alternative.
7. Various senarios were considered in both the economic and the recreational planning.
8. Rest-rotation is currently being tested on a number of allotments at CMR.
9. This has been evaluated, and the FWS feels the discussion is adequate for the size of the problem.
10. This figure is based only on those lands currently held.
11. Please see response #3 above.
12. This alternative would not meet the Service and CMR objectives.
13. FWS acknowledges this.



Charles W. Weichler
1845 S. 9th St. W. #1
Missoula, Mt. 59801

December 4, 1980

Erwin W. Steucke, Area Manager
Fish & Wildlife Service
Federal Building, Room 3085
316 North 26th Street
Billings, Montana 59101

Re: CMR's Draft Environmental Impact Statement

Mr. Steucke:

In reviewing the five alternatives, No Action, Proposed Action, Intensive Wildlife Management, Multiple Use, and No Grazing, I find no truely equitable solution to the management of CMR in these recommendations. Evaluation of these alternatives has lead me to the following conclusions:

No Action Alternative:

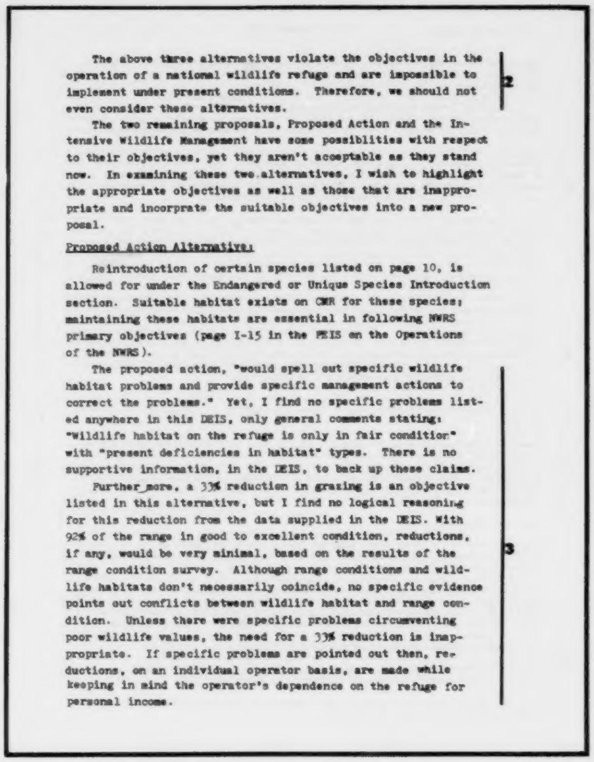
There is "no management for black-footed ferrets, bald eagles, or peregrine falcons" included in this proposal and is in direct violation of the "special mission" of the FEIS on the Operations of the NWRS. 1

Multiple Use Alternative:

The Refuge's purpose is not for multiple use (FEIS on the Operations of the NWRS) and as stated in the DEIS, "would not be possible to implement unless Congressional action changed CMR from a national wildlife refuge to a multiple use management area."

No Grazing Alternative:

Under Executive Order 7509, it would be impossible to eliminate grazing. This would also be an unjust way of treating the ranchers, especially those most dependent on the refuge AUM's for an income.



The above three alternatives violate the objectives in the operation of a national wildlife refuge and are impossible to implement under present conditions. Therefore, we should not even consider these alternatives. 2

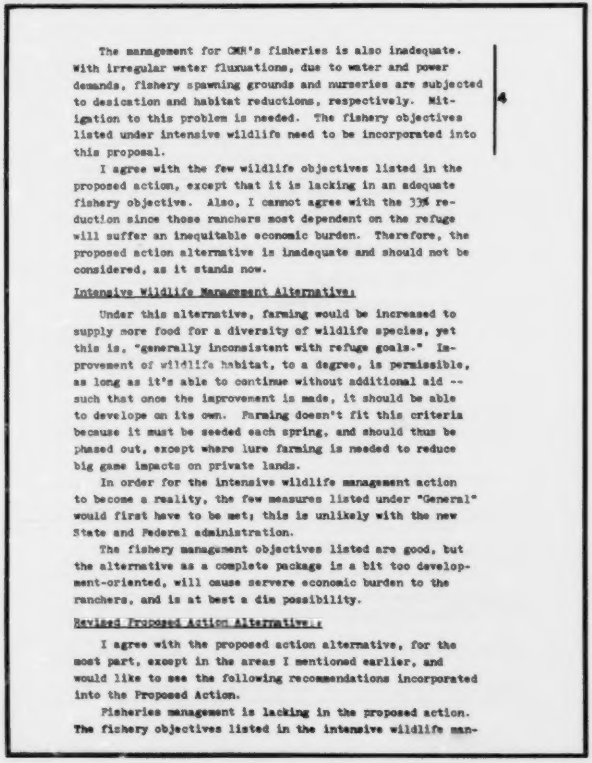
The two remaining proposals, Proposed Action and the Intensive Wildlife Management have some possiblities with respect to their objectives, yet they aren't acceptable as they stand now. In examining these two alternatives, I wish to highlight the appropriate objectives as well as those that are inappropriate and incorprate the suitable objectives into a new proposal.

Proposed Action Alternative:

Reintroduction of certain species listed on page 10, is allowed for under the Endangered or Unique Species Introduction section. Suitable habitat exists on CMR for these species; maintaining these habitats are essential in following NWRS primary objectives (page I-15 in the FEIS on the Operations of the NWRS).

The proposed action, "would spell out specific wildlife habitat problems and provide specific management actions to correct the problems." Yet, I find no specific problems listed anywhere in this DEIS, only general comments stating: "Wildlife habitat on the refuge is only in fair condition" with "present deficiencies in habitat" types. There is no supportive information, in the DEIS, to back up these claims.

Further more, a 33% reduction in grazing is an objective listed in this alternative, but I find no logical reasoning for this reduction from the data supplied in the DEIS. With 92% of the range in good to excellent condition, reductions, if any, would be very minimal, based on the results of the range condition survey. Although range conditions and wildlife habitats don't necessarily coincide, no specific evidence points out conflicts between wildlife habitat and range condition. Unless there were specific problems circumventing poor wildlife values, the need for a 33% reduction is inappropriate. If specific problems are pointed out then, reductions, on an individual operator basis, are made while keeping in mind the operator's dependence on the refuge for personal income. 3



The management for CMR's fisheries is also inadequate. With irregular water fluxuations, due to water and power demands, fishery spawning grounds and nurseries are subjected to desication and habitat reductions, respectively. Mitigation to this problem is needed. The fishery objectives listed under intensive wildlife need to be incorporated into this proposal. 4

I agree with the few wildlife objectives listed in the proposed action, except that it is lacking in an adequate fishery objective. Also, I cannot agree with the 33% reduction since those ranchers most dependent on the refuge will suffer an inequitable economic burden. Therefore, the proposed action alternative is inadequate and should not be considered, as it stands now.

Intensive Wildlife Management Alternative:

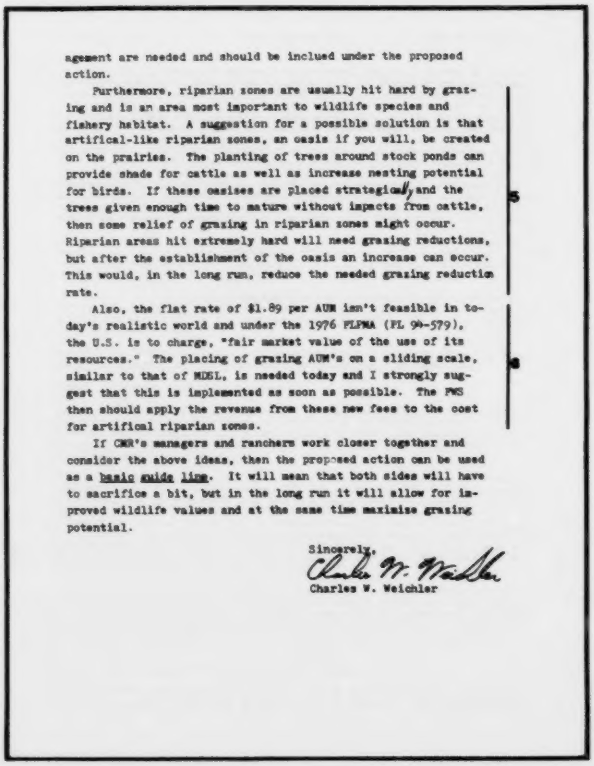
Under this alternative, farming would be increased to supply more food for a diversity of wildlife species, yet this is, "generally inconsistent with refuge goals." Improvement of wildlife habitat, to a degree, is permissible, as long as it's able to continue without additional aid -- such that once the improvement is made, it should be able to develope on its own. Farming doesn't fit this criteria because it must be seeded each spring, and should thus be phased out, except where lure farming is needed to reduce big game impacts on private lands.

In order for the intensive wildlife management action to become a reality, the few measures listed under "General" would first have to be met; this is unlikely with the new State and Federal administration.

The fishery management objectives listed are good, but the alternative as a complete package is a bit too development-oriented, will cause servere economic burden to the ranchers, and is at best a dim possibility.

Revised Proposed Action Alternative:

I agree with the proposed action alternative, for the most part, except in the areas I mentioned earlier, and would like to see the following recommendations incorporated into the Proposed Action.



Fisheries management is lacking in the proposed action. The fishery objectives listed in the intensive wildlife management are needed and should be inclued under the proposed action.

Furthermore, riparian zones are usually hit hard by grazing and is an area most important to wildlife species and fishery habitat. A suggestion for a possible solution is that artifical-like riparian zones, an oasis if you will, be created on the prairies. The planting of trees around stock ponds can provide shade for cattle as well as increase nesting potential for birds. If these oasises are placed strategically and the trees given enough time to mature without impacts from cattle, then some relief of grazing in riparian zones might occur. Riparian areas hit extremely hard will need grazing reductions, but after the establishment of the oasis an increase can occur. This would, in the long run, reduce the needed grazing reduction rate. 5

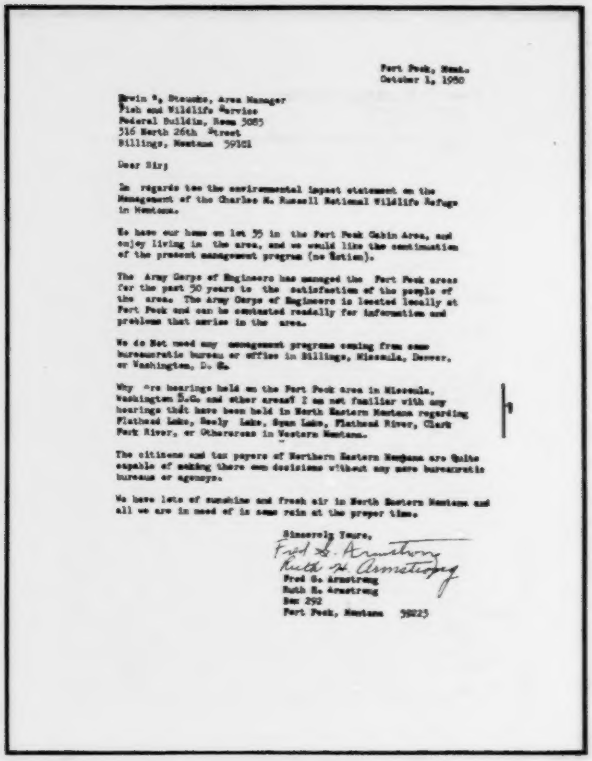
Also, the flat rate of $1.89 per AUM isn't feasible in today's realistic world and under the 1976 FLPMA (PL 94-579), the U.S. is to charge, "fair market value of the use of its resources." The placing of grazing AUM's on a sliding scale, similar to that of MDSL, is needed today and I strongly suggest that this is implemented as soon as possible. The FWS then should apply the revenue from these new fees to the cost for artifical riparian zones. 6

If CMR's managers and ranchers work closer together and consider the above ideas, then the proposed action can be used as a basic guide line. It will mean that both sides will have to sacrifice a bit, but in the long run it will allow for improved wildlife values and at the same time maximise grazing potential.

Sincerely,
Charles W. Weichler
Charles W. Weichler

Response to Mr. Charles W. Weichler

1. The text has been revised to indicate FWS responsibilities.
2. CEQ regulations require the evaluation of alternatives including those outside the authority of the lead agency.
3. Please see Appendix 1b and Appendix 2. Further detail is available for review in the refuge headquarters at Lewistown, Montana.
4. The FWS will coordinate with the COE and the Montana Department of Fish, Wildlife, and Parks to manage fisheries to the best extent possible, bearing in mind each agency's mission and directives.
5. This will be evaluated for the habitat management plan for each allotment.
6. The economics have been reevaluated and the text revised accordingly.



Fort Peck, Mont.
October 1, 1980

Edwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Buildin, Room 3085
316 North 26th Street
Billings, Montana 59101

Dear Sir;

In regards too the environmental impact statement on the Management of the Charles M. Russell National Wildlife Refuge in Montana.

We have our home on lot 55 in the Fort Peck Cabin Area, and enjoy living in the area, and we would like the continuation of the present management program (no Action).

The Army Corps of Engineers has managed the Fort Peck areas for the past 50 years to the satisfaction of the people of the area. The Army Corps of Engineers is located locally at Fort Peck and can be contacted readally for information and problems that arrise in the area.

We do Not need any management programs coming from some bureaucratic bureau or office in Billings, Missoula, Denver, or Washington, D. C.

Why are hearings held on the Fort Peck area in Missoula, Washington D.C. and other areas? I am not familiar with any hearings that have been held in North Eastern Montana regarding Flathead Lake, Seely Lake, Swan Lake, Flathead River, Clark Fork River, or Otherareas in Western Montana.

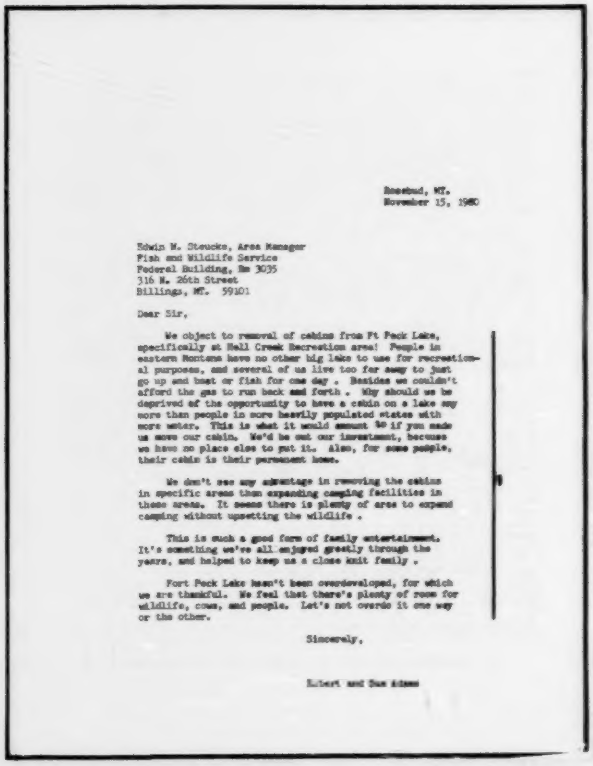
The citizens and tax payers of Northern Eastern Montana are Quite capable of making there own decisions without any more bureaucratic bureaus or agencys.

We have lots of sunshine and fresh air in North Eastern Montana and all we are in need of is some rain at the proper time.

Sincerely Yours,
Fred G. Armstrong
Ruth H. Armstrong
Fred G. Armstrong
Ruth H. Armstrong
Box 292
Fort Peck, Montana 59223

Response to Mr. and Mrs. Fred G. Armstrong

1. The Charles M. Russell National Wildlife Refuge is a national wildlife refuge, and as such, it belongs to all the people of the United States. Many people outside the immediate area and outside Montana have a valid interest in the operation and management of the refuge, and it is proper and fitting that they, too, have some input into that management and operation.



Rosebud, MT.
November 15, 1980

Edwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Rm 3035
316 N. 26th Street
Billings, MT. 59101

Dear Sir,

We object to removal of cabins from Ft Peck Lake, specifically at Hell Creek Recreation area! People in eastern Montana have no other big lake to use for recreational purposes, and several of us live too far away to just go up and boat or fish for one day. Besides we couldn't afford the gas to run back and forth. Why should we be deprived of the opportunity to have a cabin on a lake any more than people in more heavily populated states with more water. This is what it would amount to if you made us move our cabin. We'd be out our investment, because we have no place else to put it. Also, for some people, their cabin is their permanent home.

We don't see any advantage in removing the cabins in specific areas than expanding camping facilities in these areas. It seems there is plenty of area to expand camping without upsetting the wildlife.

This is such a good form of family entertainment. It's something we've all enjoyed greatly through the years, and helped to keep us a close knit family.

Fort Peck Lake hasn't been overdeveloped, for which we are thankful. We feel that there's plenty of room for wildlife, cows, and people. Let's not overdo it one way or the other.

Sincerely,

Elbert and Sue Adams

Response to Mr. and Mrs. Robert Adams

I. The FWS does not propose to eliminate or reduce the cabin areas at CMR.

Box 288, South Star Route
Nashua, Montana 59248
October 26, 1980

Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3085
316 North 26th street
Billings, Montana 59101

Dear Sir:

In accordance with the plan of public hearings, I wish to comment on the draft EIS entitled "Management of Charles M. Russell National Wildlife Refuge."

Since we have to state a preference of the alternatives, I feel the alternative "Continuation of the present management program (no action), although not entirely satisfactory, is the best alternative.

My second choice of alternatives is alternate 3, Multiple Use, although again, it is not entirely satisfactory.

The other alternatives are completely unacceptable and totally impractical.

My specific comments concering the EIS, relating to the various alternatives is as follows:

The EIS, as a management plan has many serious flaws. The most serious one is that nowhere do we find and identify the input from the actual revenue producing users, that is, the livestock producers who pay cash leases for the grass for grazing. We have no difficulty seeing the input from the outside recreational interests. We fail to see the input from the cottage site leasees. 1

Another serious flaw is the lack of accuracy. As an example, the statement is made in the EIS "clarification of conflicting legislation and management responsibilities between COE and FWS would be sought. A cooperative effort with COE would be launched to determine ownership of all lands within the C.M.R. boundary. These areas are generally associated with COE purchases made in the 1930's for the Fort Peck Project and title to some of these parcels is unknown." This statement is outright inaccurate and misleading. In over 30 years of experience working with these specific lands, there has never been a time when ownership could not be determined. Lands which were purchased in fee simple had the deeds recorded in the public records in the courthouse of the county in which the lands lie. Lands withdrawn by executive order for project purposes were listed in the executive order by aliquot part of section, section, township, range just as all proper land descriptions in Montana are described, and they too, are recorded in the public land records in the local courthouse. The private landowners within the C.M.R. boundaries land ownership is recorded. These landowners would resent it if you are attempting to cast a cloud over their ownership. So I say, just what specific tracts of land, listed by standard description, are you talking about? 2

There is an audited real estate map available to you of all lands involved by purchase and by withdrawal. I was present when this map was offered to your study team, and discussed. It is not included in the EIS. This points out that your plan does not contain actual input from the people most concerned. Now in regard to the conflicting legislation you refer to. Your plan would be more creditable if you would quote the legislation that is conflicting, and show just how it conflicts. Without this, the plan leaves us with the impression that an effort is being made to confuse the situation, which is something the federal government does not need in a management plan. The legislators I am certain, would want to be apprised of this so called "conflict". Frankly, I fail to know of any conflict, either in ownership or management responsibilies that needs resolving. 3

Throughout the plan, the lack of specifics are apparent. This is a serious flaw. Let me list one with which every one is concerned. Under one of the alternatives the plan states "Some of the inholders (private landowners) lands will be acquired" Now which ever the inholders are, they want to know if the land they own will be acquired, what the policy will be, and what their options are. A "willing buyer, willing seller" purchase situation is suggested by the F&WL Service. The fact is, that as long as the buyer has, or can get the power of condemnation, there is no such thing as willing buyer, willing seller situation. Even without this power, many pressures can be brought to bear against the private landowner, which make the federal agency a poor neighbor, if you are the landowner. This I can relate to well, as I am an inholder in Glacier National Park. 4

While an effort is made by tabulation of data to show economic losses resultant from the alternatives that emphasize wildlife production and eliminate grazing, or permit grazing within limits, no real cost analysis, showing the impact on the community, the livestock producer, and Montana is readily understandable. This should be shown by graphs or charts so one could readily obtain the comparisons needed to understand. The statement is made in the EIS that a cost-benefit analysis is not required by an environmental quality council ruling of previous date. This is unacceptable, because of the fact that the alternatives given in the management plan are serious to the economy, serious to food production, and serious to people whose only livelihood depends on the leasing of the grass for livestock production. In addition, a simple table is not adequate. The data must be better substantiated to be creditable. Any management decision must weigh the costs and the benefits to be a wise decision. More specific data, I am certain, would show the folly of some of the alternatives. It cannot be stressed enough, that the management plan cannot be effective until all available facts and conditions are known. The costs of administering the plan, the incomes from all sources (not intangible ones such as "sightseeing") must be shown. None of the plans do this well. 5 In addition, why are not management plans for intensified livestock production considered? The executive order withdrawing the lands provided for grazing as well as wildlife production.? 6

7 The management plan shows the range to be in good to excellent condition, so far as the grazing allotments are concerned in the table covering the various grazing allotments. Yet is says the range is poor so far as wildlife forage is concerned. This appears to be a descrepant statement, in view of the fact that this year the game is definitely in excellent condition, and the population trends are upward, despite two years of drought. Thus the statement regarding wildlife is apparently not well founded, but reflects more or less an arbitrary opinion.

Again, I want to stress the necessity for input from the people who are directly concerned with the C.M.R. lands. For example, I was at one time, for a short time, on a so called steering committee. Input we offered at that time is nowhere in evidence. I obtain the impression the only reason I was named to the committee was so the F& WL Service could use my name to offer creditability to the plan. It certainly couldn't have been to use the input we provided. 8

In summary, I want to make the following points:

A management plan, to be effective, and to gain acceptance, needs to consider all those who are directly involved in the land usage, and to involve them directly in the formulation of the plan. Outside interests certainly can have helpful advice, but the fundamental plans must come from the users. This plan does not do that, but instead is drawn up by people who talk glowingly of "mandates", and have never met a payroll themselves, do not pay taxes on food and fiber producing land, and have doubtfully ever managed a tract of land or a livestock operation for a sole source of a living. Thus the plan lacks acceptance.

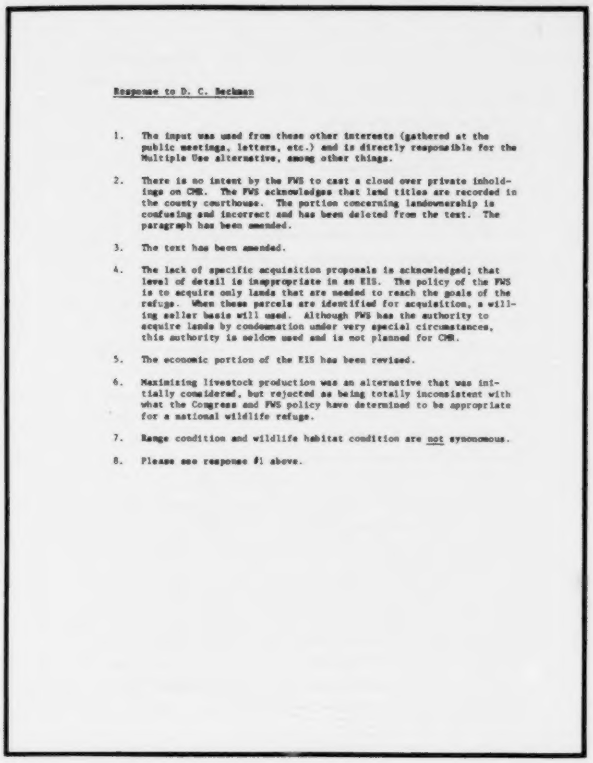
The management plan needs to get down to plain every day accuracy. I have mentioned some of the inaccuracy.

The plan needs to get down to fundamentals. Raising prairie dogs in hopes a black (flat) footed ferret will appear is simply not practical. Neither is building nests for a falcon, which is included in one of the alternatives. Such considerations need to be looked at critically, for practicality. Those who deal in theory and who have only classroom experience tend to develop plans such as is mentioned, even though they can contribute other valuable items. A better, acceptable plan to the users can be made, if serious consideration is given to the above comments.

As a final suggestion, I would offer that the two plans I mentioned in the beginning as choices, be modified so as to include the items stated above. The comments are not intended to be anything but helpful.

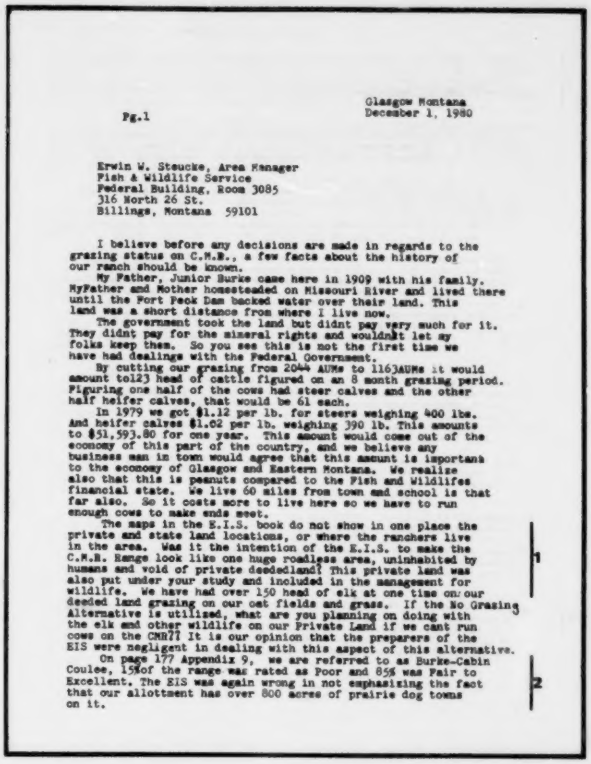
I thank you for the opportunity to comment.

Sincerely,
D.C. Beckman
D. C. Beckman



Response to D. C. Beckman

1. The input was used from these other interests (gathered at the public meetings, letters, etc.) and is directly responsible for the Multiple Use alternative, among other things.
2. There is no intent by the FWS to cast a cloud over private inholdings on CMR. The FWS acknowledges that land titles are recorded in the county courthouse. The portion concerning landownership is confusing and incorrect and has been deleted from the text. The paragraph has been amended.
3. The text has been amended.
4. The lack of specific acquisition proposals is acknowledged; that level of detail is inappropriate in an EIS. The policy of the FWS is to acquire only lands that are needed to reach the goals of the refuge. When these parcels are identified for acquisition, a willing seller basis will used. Although FWS has the authority to acquire lands by condemnation under very special circumstances, this authority is seldom used and is not planned for CMR.
5. The economic portion of the EIS has been revised.
6. Maximizing livestock production was an alternative that was initially considered, but rejected as being totally inconsistent with what the Congress and FWS policy have determined to be appropriate for a national wildlife refuge.
7. Range condition and wildlife habitat condition are not synonomous.
8. Please see response #1 above.



Pg.1

Glasgow Montana
December 1, 1980

Erwin W. Steucke, Area Manager
Fish & Wildlife Service
Federal Building, Room 3085
316 North 26 St.
Billings, Montana 59101

I believe before any decisions are made in regards to the grazing status on C.M.R., a few facts about the history of our ranch should be known.

My Father, Junior Burke came here in 1909 with his family. MyFather and Mother homesteaded on Missouri River and lived there until the Fort Peck Dam backed water over their land. This land was a short distance from where I live now.

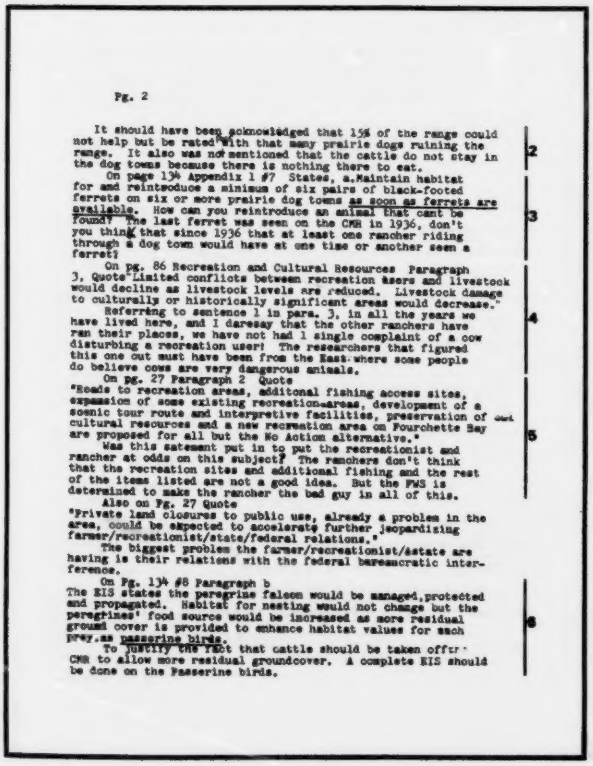
The government took the land but didnt pay very much for it. They didnt pay for the mineral rights and wouldnt let my folks keep them. So you see this is not the first time we have had dealings with the Federal Government.

By cutting our grazing from 2044 AUMs to 1163AUMs it would amount to123 head of cattle figured on an 8 month grazing period. Figuring one half of the cows had steer calves and the other half heifer calves, that would be 61 each.

In 1979 we got $1.12 per lb. for steers weighing 400 lbs. And heifer calves $1.02 per lb. weighing 390 lb. This amounts to $51,593.80 for one year. This amount would come out of the economy of this part of the country, and we believe any business man in town would agree that this amount is important to the economy of Glasgow and Eastern Montana. We realize also that this is peanuts compared to the Fish and Wildlifes financial state. We live 60 miles from town and school is that far also. So it costs more to live here so we have to run enough cows to make ends meet.

The maps in the E.I.S. book do not show in one place the private and state land locations, or where the ranchers live in the area. Was it the intention of the E.I.S. to make the C.M.R. Range look like one huge roadless area, uninhabited by humans and void of private deededland? This private land was also put under your study and included in the management for wildlife. We have had over 150 head of elk at one time on our deeded land grazing on our oat fields and grass. If the No Grazing Alternative is utilized, what are you planning on doing with the elk and other wildlife on our Private Land if we cant run cows on the CMR?? It is our opinion that the preparers of the EIS were negligent in dealing with this aspect of this alternative. 1

On page 177 Appendix 9, we are referred to as Burke-Cabin Coulee, 15%of the range was rated as Poor and 85% was Fair to Excellent. The EIS was again wrong in not emphasizing the fact that our allottment has over 800 acres of prairie dog towns on it. 2



Pg. 2

It should have been acknowledged that 15% of the range could not help but be rated with that many prairie dogs ruining the range. It also was not mentioned that the cattle do not stay in the dog towns because there is nothing there to eat. 2

On page 134 Appendix 1 #7 States, a.Maintain habitat for and reintsoduce a minimum of six pairs of black-footed ferrets on six or more prairie dog towns as soon as ferrets are available. How can you reintroduce an animal that cant be found? The last ferret was seen on the CMR in 1936, don't you think that since 1936 that at least one rancher riding through a dog town would have at one time or another seen a ferret? 3

On pg. 86 Recreation and Cultural Resources Paragraph 3, Quote"Limited conflicts between recreation users and livestock would decline as livestock levels are reduced. Livestock damage to culturally or historically significant areas would decrease."

Referring to sentence 1 in para. 3, in all the years we have lived here, and I daresay that the other ranchers have ran their places, we have not had 1 single complaint of a cow disturbing a recreation user! The researchers that figured this one out must have been from the East where some people do believe cows are very dangerous animals. 4

On pg. 27 Paragraph 2 Quote
"Roads to recreation areas, additonal fishing access sites, expansion of some existing recreation-areas, development of a scenic tour route and interpretive facilities, preservation of cultural resources and a new recreation area on Fourchette Bay are proposed for all but the No Action alternative."

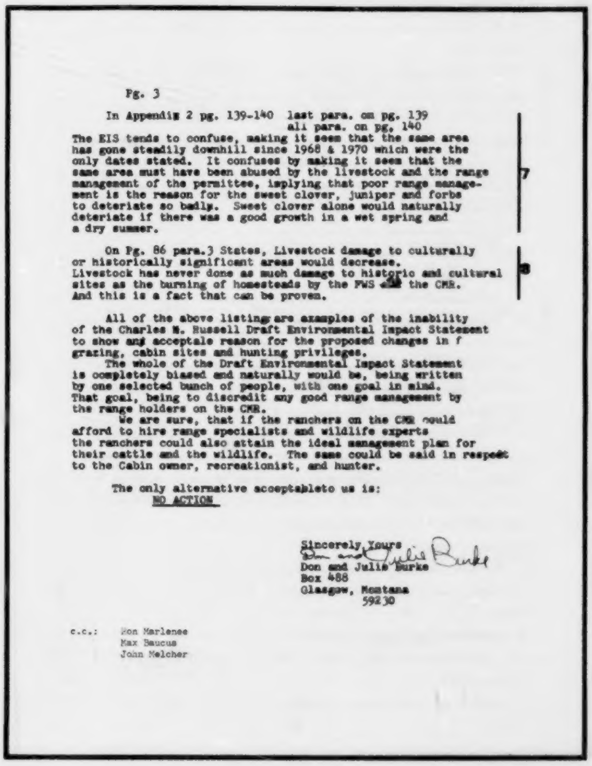
Was this satement put in to put the recreationist and rancher at odds on this subject? The ranchers don't think that the recreation sites and additional fishing and the rest of the items listed are not a good idea. But the FWS is determined to make the rancher the bad guy in all of this. 5

Also on Pg. 27 Quote
"Private land closures to public use, already a problem in the area, could be expected to accelerate further jeopardizing farmer/recreationist/state/federal relations."

The biggest problem the farmer/recreationist/astate are having is their relations with the federal bareaucratic interference.

On Pg. 134 #8 Paragraph b
The EIS states the peregrine falcon would be managed,protected and propagated. Habitat for nesting would not change but the peregrines' food source would be increased as more residual ground cover is provided to enhance habitat values for such prey.as passerine birds.

To justify the fact that cattle should be taken off the CMR to allow more residual groundcover. A complete EIS should be done on the Passerine birds. 6



Pg. 3

In Appendix 2 pg. 139-140 last para. on pg. 139
all para. on pg. 140
The EIS tends to confuse, making it seem that the same area has gone steadily downhill since 1968 & 1970 which were the only dates stated. It confuses by making it seem that the same area must have been abused by the livestock and the range management of the permittee, implying that poor range management is the reason for the sweet clover, juniper and forbs to deteriate so badly. Sweet clover alone would naturally deteriate if there was a good growth in a wet spring and a dry summer. 7

On Pg. 86 para.3 States, Livestock damage to culturally or historically significant areas would decrease. Livestock has never done as much damage to historic and cultural sites as the burning of homesteads by the FWS and the CMR. And this is a fact that can be proven. 8

All of the above listing are examples of the inability of the Charles M. Russell Draft Environmental Impact Statement to show any acceptale reason for the proposed changes in f grazing, cabin sites and hunting privileges.

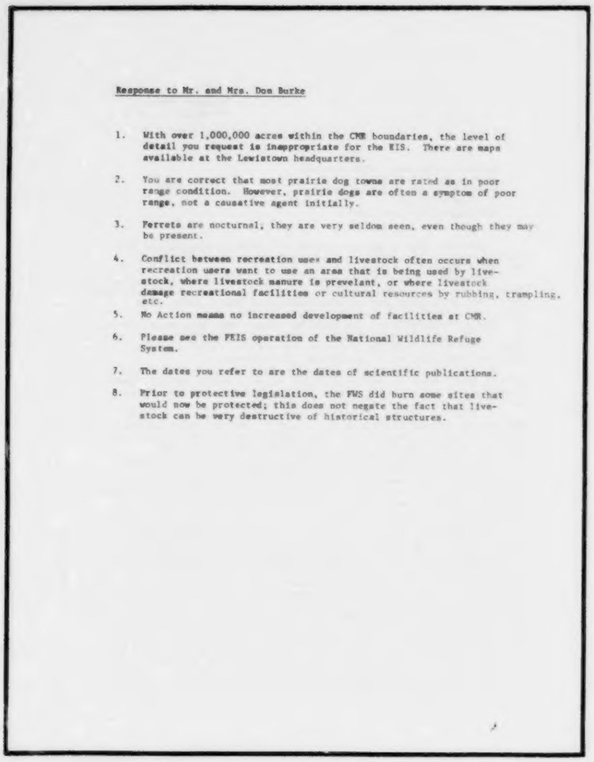
The whole of the Draft Environmental Impact Statement is completely biased and naturally would be, being written by one selected bunch of people, with one goal in mind. That goal, being to discredit any good range management by the range holders on the CMR.

We are sure, that if the ranchers on the CMR could afford to hire range specialists and wildlife experts the ranchers could also attain the ideal management plan for their cattle and the wildlife. The same could be said in respect to the Cabin owner, recreationist, and hunter.

The only alternative acceptableto us is:
NO ACTION

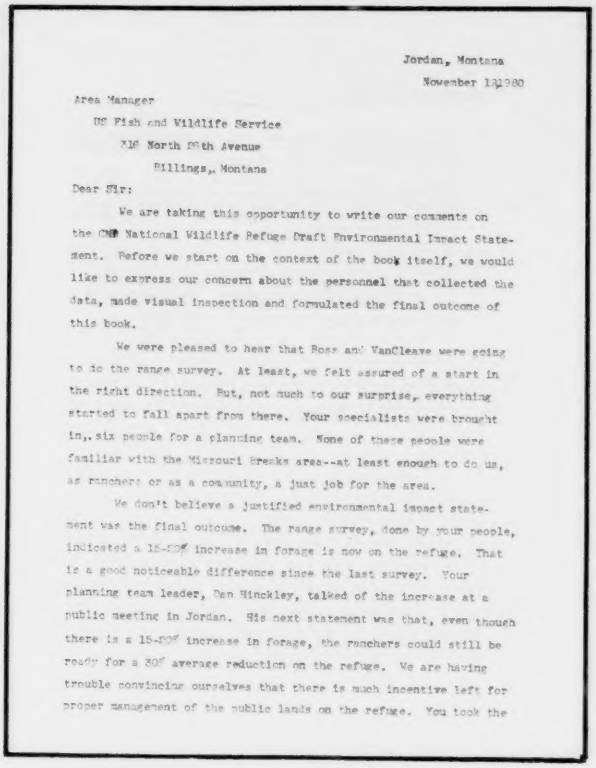
Sincerely Yours
Don and Julie Burke
Don and Julie Burke
Box 488
Glasgow, Montana
59230

c.c.: Ron Marlenee
Max Baucus
John Melcher



Response to Mr. and Mrs. Don Burke

1. With over 1,000,000 acres within the CMR boundaries, the level of detail you request is inappropriate for the EIS. There are maps available at the Lewistown headquarters.
2. You are correct that most prairie dog towns are rated as in poor range condition. However, prairie dogs are often a symptom of poor range, not a causative agent initially.
3. Ferrets are nocturnal, they are very seldom seen, even though they may be present.
4. Conflict between recreation uses and livestock often occurs when recreation users want to use an area that is being used by livestock, where livestock manure is prevelant, or where livestock damage recreational facilities or cultural resources by rubbing, trampling, etc.
5. No Action means no increased development of facilities at CMR.
6. Please see the FEIS operation of the National Wildlife Refuge System.
7. The dates you refer to are the dates of scientific publications.
8. Prior to protective legislation, the FWS did burn some sites that would now be protected; this does not negate the fact that livestock can be very destructive of historical structures.



Jordan, Montana
November 13 1980

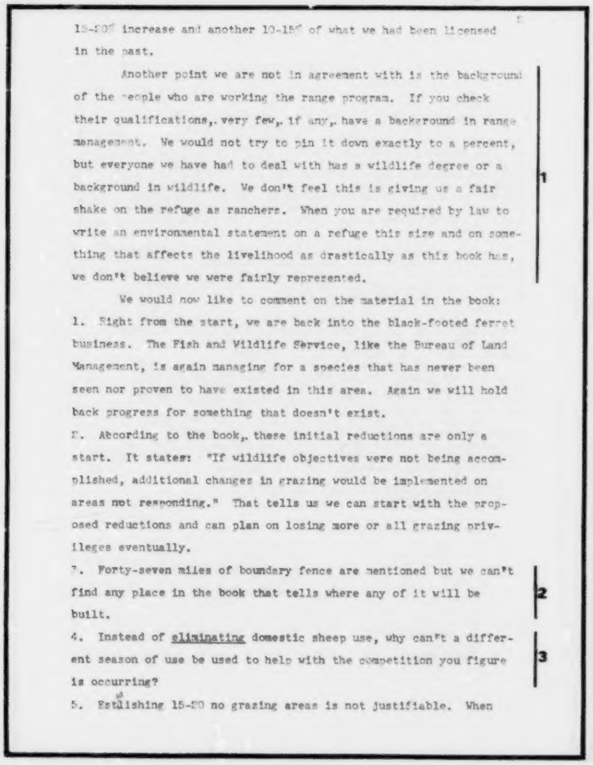
Area Manager
US Fish and Wildlife Service
316 North 26th Avenue
Billings, Montana

Dear Sir:

We are taking this opportunity to write our comments on the CMR National Wildlife Refuge Draft Environmental Impact Statement. Before we start on the context of the book itself, we would like to express our concern about the personnel that collected the data, made visual inspection and formulated the final outcome of this book.

We were pleased to hear that Ross and VanCleave were going to do the range survey. At least, we felt assured of a start in the right direction. But, not much to our surprise, everything started to fall apart from there. Your specialists were brought in, six people for a planning team. None of these people were familiar with the Missouri Breaks area--at least enough to do us, as ranchers or as a community, a just job for the area.

We don't believe a justified environmental impact statement was the final outcome. The range survey, done by your people, indicated a 15-20% increase in forage is now on the refuge. That is a good noticeable difference since the last survey. Your planning team leader, Dan Hinckley, talked of the increase at a public meeting in Jordan. His next statement was that, even though there is a 15-20% increase in forage, the ranchers could still be ready for a 30% average reduction on the refuge. We are having trouble convincing ourselves that there is much incentive left for proper management of the public lands on the refuge. You took the



15-20% increase and another 10-15% of what we had been licensed in the past.

Another point we are not in agreement with is the background of the people who are working the range program. If you check their qualifications, very few, if any, have a background in range management. We would not try to pin it down exactly to a percent, but everyone we have had to deal with has a wildlife degree or a background in wildlife. We don't feel this is giving us a fair shake on the refuge as ranchers. When you are required by law to write an environmental statement on a refuge this size and on something that affects the livelihood as drastically as this book has, we don't believe we were fairly represented. 1

We would now like to comment on the material in the book:

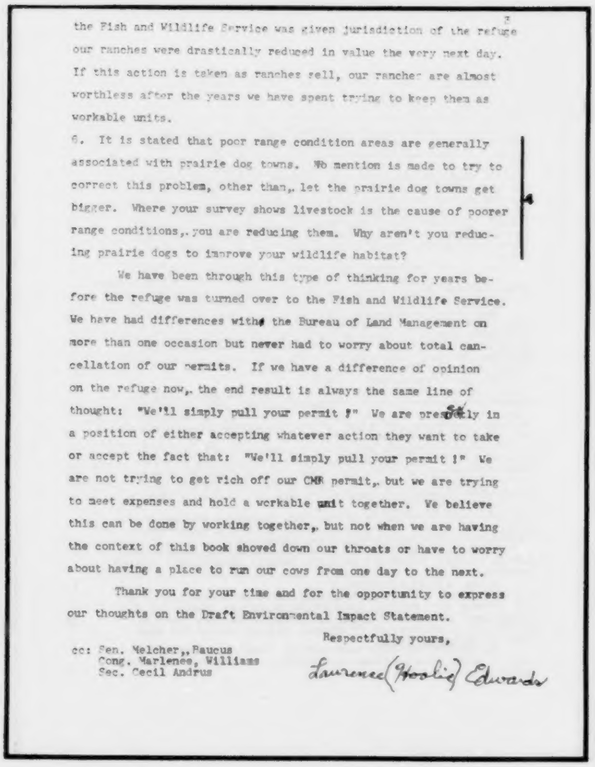
1. Right from the start, we are back into the black-footed ferret business. The Fish and Wildlife Service, like the Bureau of Land Management, is again managing for a species that has never been seen nor proven to have existed in this area. Again we will hold back progress for something that doesn't exist.

2. According to the book, these initial reductions are only a start. It states: "If wildlife objectives were not being accomplished, additional changes in grazing would be implemented on areas not responding." That tells us we can start with the proposed reductions and can plan on losing more or all grazing privileges eventually.

3. Forty-seven miles of boundary fence are mentioned but we can't find any place in the book that tells where any of it will be built. 2

4. Instead of eliminating domestic sheep use, why can't a different season of use be used to help with the competition you figure is occurring? 3

5. Establishing 15-20 no grazing areas is not justifiable. When



the Fish and Wildlife Service was given jurisdiction of the refuge our ranches were drastically reduced in value the very next day. If this action is taken as ranches sell, our ranches are almost worthless after the years we have spent trying to keep them as workable units.

6. It is stated that poor range condition areas are generally associated with prairie dog towns. No mention is made to try to correct this problem, other than, let the prairie dog towns get bigger. Where your survey shows livestock is the cause of poorer range conditions, you are reducing them. Why aren't you reducing prairie dogs to improve your wildlife habitat? 4

We have been through this type of thinking for years before the refuge was turned over to the Fish and Wildlife Service. We have had differences with the Bureau of Land Management on more than one occasion but never had to worry about total cancellation of our permits. If we have a difference of opinion on the refuge now, the end result is always the same line of thought: "We'll simply pull your permit !" We are presently in a position of either accepting whatever action they want to take or accept the fact that: "We'll simply pull your permit !" We are not trying to get rich off our CMR permit, but we are trying to meet expenses and hold a workable unit together. We believe this can be done by working together, but not when we are having the context of this book shoved down our throats or have to worry about having a place to run our cows from one day to the next.

Thank you for your time and for the opportunity to express our thoughts on the Draft Environmental Impact Statement.

Respectfully yours,

Laurence (Hoolie) Edwards

cc: Sen. Melcher, Baucus
Cong. Marlenee, Williams
Sec. Cecil Andrus

Response to Mr. Laurence Edwards

1. Although most of the refuge staff have wildlife degrees rather than range, there are almost 110 years of grassland management experience with federal land management agencies on the CMR staff. In addition, two staff members have degrees in range management.
2. That level of detail is inappropriate for an EIS.
3. Numerous studies have documented major conflicts between wildlife and domestic sheep. For this reason, FWS policy prohibits the grazing of domestic sheep on Service lands.
4. Prairie dogs are wildlife and create wildlife habitat. They are a symptom of poor range condition (not synonomous with wildlife habitat condition) and not generally the cause of it.

COMMENTS ON E.I.S. OF C.M.R.

I am Francis Henning a livestock operator in and adjoining the C.M.R. I hardly know where to start to comment on the monstrosity EIS put out by FWS on CMR. I understand it cost approximately $7,000,000.00. Boy, what improvements for wildlife and livestock ranchers and local people could have made with $7,000,000.00 ! Interseeding, ripping, dam construction for water distribution and more access facilities. 1

Page VIII 2nd paragraph: "States CMR is not a typical refuge." This I agree with but have you seen an adjustment of regulations to fit this condition? Obviously not, but I have seen many attempts to force regulations, which have not fit the situation made by people unacquainted with actual situation, down the throats of our local people and economic expense locally and nationally.

Page IX 3rd paragraph. "Portions of the refuge in poor range condition are generally associated with prairie dog towns or flood plains." But what has FWS done to remedy this? Nothing, in fact their plans call for an increase approximately ten-fold of prairie dogs at the expense of range conditions and which automatically requires more surveillance, labor and expense locally to keep them from private lands.

There was and is a dog town on our allotment when I moved here 29 years ago. Twice poison has been used to control-not eliminate this town. In 1951 town covered approximately 30 acres, now it is approximately 4 times as large. 4 other dog towns have started from it. I have taken visitors from other states to view this five times, but no other people have deliberately viewed it to my knowledge. No production of palatable, usable forage on 30 to over 100 acres for 29 years is rather expensive for 20 people to view for 15 minutes in 29 years; not to mention time, labor, and expense required to have kept them from expanding farther than they have. One location they have tried to occupy is five miles from original town and one and one-half miles outside the refuge.

Page IX paragraph 4: "Visitor days occurred near east end near developed areas." These areas have been developed by COE not by FWS. In fact action by FWS just prior to July 1979 clearly indicate FWS desire to close out most visiting and access areas and also control water release from dam along with electricity generation. Obviously not for benefit of general public and local economy but to build their own bureaucratic empire Please note that four of the five alternatives would increase the scope of FWS.

Page 1 3rd paragraph: "Misunderstanding arises from refuge management." I must say this is a false statement. It is quite obvious FWS desire to expand their power and size at the expense of local economy, local and regional recreation and adjoining agriculture contributing to our native food supply.

Page 1, paragraph 4: "A growing regional and national sentiment by environmental groups for reduction or elimination of livestock grazing." A very clear indication that majority of these groups are not familiar with actual conditions and circumstances surrounding this refuge was clearly given at the Sage Brush Rebellion informational meetings held in Miles City in July 1980. The representative of the Wildlife Federation clearly showed in his presentation he was not familiar with conditions in surrounding CMR but wanted to dominate policy of FWS concerning CMR.

Every instance where fencing is mentioned in all plans it is to control livestock. Not one mention is made of controlling foraging wildlife and very limited mention of controling predators. Thus leaving all damage of foraging wildlife to expense of local agriculture and also the major brunt of predator damage. At present it is only with extreme hardship can a garden be raised near the refuge and chickens for your own meat and eggs is next to impossible to keep. 2

OVER

Numerous mention is made of EIS to COE, SLB and how their policies and goals would have to be changed but not one mention is made of impact the loss of such policies might make locally and nation wide. All mention indicates a domination by FWS not a compatable cooperation. I am sure the dependable and consistant production of electricity alone by the COE at Ft. Peck is much, much more beneficial to our total economy than the CMR would as an exclusive wild life refuge. 3

Page 29: These two tables are just wild guesses. Changes in national or regional economy would make both charts so far out of line they would be completely worthless, current conditions indicate this is very highly probable. Table 2 does not make sense to me. For example, an increase in employment under No Action is not consistent with their statement page 8. Unless they are planning on this increase of FWS personell.

Table 3 merely indicates their estimate in direct income to permittees at 1978-9 prices it completely ignores the age old adage that income to the original producer turnes over seven times on an average before it leaves the community (taxes, interest, fuel, food, clothing, supplies, amusement, equipment, repairs and wages.) When a more accurate perspective is used it makes their final paragraph on page 30 an outright falsehood. 4

Appendix 9 page 178. I have lived on this ranch for 29 years and my knowledge of my own operation and adjoining ranches makes information presented here misleading and less than accurate. Nothing lower than good conditions is indicated for our allottment, and I have indicated before in regard to prairie dogs this is incorrect, and nothing has been done to correct it nor have I heard anything or seen anything to indicate that FWS will do a thing but let it continue to deteriate and prohibit me from correcting the situation.

A dog town which apparently spread from our original town is on private lands of an absentee owner. FWS nor anyone else have done nothing to control this so there is approximately 40 acres of good land with no gainful production dominated by FWS. 5

Appendix 10, Page 181: If the information in total appendix 10 is like our operation and adjoining ranches, it is next to worthless. Their question for this appendix was, "How many cattle do you own?" Not "How many cattle do you graze on ranch in connection with CMR?" Examples: Some people graze livestock elsewhere a portion of year, others may take cattle on shares for grazing. 6

After an extensive study of this appendix I would estimate impact has been toned down or under-estimated about one-third.

Our own operation, considering use by former owners before being added to our operation, has been reduced from over 450 head yearly to approximately 400 head yearly with another 15% reduction in grazing of refuge planned by FWS for 1981.. There There is no regulation or intention to reinstate grazing when weather conditions permit that I can learn of.

On one portion of ranch we use mostly for fall and winter we have no reliable stock water and must depend on lake for water. Fencing of the Refuge in this area requires one and one-half mile of fence dividing on private held lands. We have tried to develope water on this range and have been unsuccessful. On one adjoining ranch if Refuge is fences on line his BLM permit would be at least 50% useless from lack of water and no chance of development. Another adjoining ranch BLM permit would be at least 25% reduced because of lack of adequate water and very small chance of developing suitable water supply. This place changed hands in 1977 and present owner has been understocked. His grazing was reduced when he took over and another reduction is proposed at this time even though he has grazed approximately 50% since taking possession. FWS has also bothered rancher to try and have a later turn-out date, even though he was using approximately one half of graze allotted to livestock after reservation for wildlife. 7

Let me make it clear, I am not opposed to wildlife in a practical way and amount. But definitely again, wildlife forcing agriculture out of business at the expense and livelyhood of local ranchers regional economy and our nations food supply is foolish. I like to view wildlife and hunt as well as anyone else, but there is a practical limit. The goals and regulations of FWS at present are completely ipractical. I have copies and patents of lands dating from early 1900 to 1946 and not one requires. us to furnish feed for wildlife. Everyone near the Refuge knows there are more wildlife outside the Refuge on a yearly basis than inside. This fact was not included in EIS that I can find, but was noted by personel doing range survey work for EIS according to reports reaching me. Nor is there a proposal of cooperatively promoting wildlife and wildlife habitat with adjoining ranchers outside the refuge. This is another example of EIS slant toward FWS in place of an accurate picture.

The regulations of FWS do not allow for appeals on grazing infractions or alleged infractions or reductions in grazing, but does provide for stiff penalties at the discretion of FWS personnel. Therefore we have a bureau within our supposedly democratic government which wields almost dictatoral power. A person committing murder has more chances of appeal than a leasee from the FWS. 8

I would like to suggest a practical common sense solution. Turn the grazing control back to BLM and control of wildlife to State Department of Fish and Wildlife and Parks. Both departments are active in their own field and a cooperative program could be worked out with COE to expand recreational needs to meet the demand as far as practical. A program of ripping, interseeding and water development would increase forage and distribution of livestock and limited amount of croping inside Refuge would attract wildlife away from private holdings outside Refuge. Wildlife supposedly belongs to the state, shouldn't the state be managing it?

I have lived here twenty-nine years and have not seen one constructive thing come from FWS. No noxious weed control, no extensive predator control, no wildlife control to prevent damage to private property or growing crops. Instead their actions have caused ranchers numerous problems and hardships hindering his livelyhood and his production for the Nations food supply.

Respectfully submitted
Francis L Henning
Jordan, Mt.

Francis Henning
Star Route 2 Box 19
Jordan, Montana 59337

Response to Mr. Francis L. Henning

1. Your figures are grossly in error; cost was considerably less than what you quote.
2. Since CMR is a national wildlife refuge, wildlife do not need to be controlled in most cases.
3. The text has been amended.
4. The economic portion of the text has been revised.
5. Animal Damage Control personnel of the FWS will provide assistance upon a request from a private landowner.
6. The question was designed to determine the percent of the permittee's total operation that was dependent on CMR.
7. FWS will not create waterless allotments or pastures by fencing.
8. FWS grazing regulations do allow appeal through the Refuge Manager, Area Manager, and Regional Director. Trespass livestock offenses are violations of federal law and are prosecuted through federal courts. Civil appeal may be initiated at any time through the U.S. court system.

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1. (Dave Huston)

CONCERNING SUMMARY OF EIS AND MANAGEMENT PLAN. on the CMRussell game range

It is always easier to give a solution to any problem if you don't know anything about it. That is what we have here. The man they imported to run the planning team knew nothing about the country, nothing about livestock and less than that about wildlife. But that didn't make much difference as it was already decided in Washington D.C. what they wanted the planning team to plan. This EIS is full of lies from cover to cover. They start the first page with the big one---they say the management plan of the CMR has suffered from lack of planning and conflicting jurisdiction of three agencies. The two other agencies mentioned have proved much more efficient land owners than the U.S. Fish & Wildlife. The only suffering the CMR has experienced has been since the U.S. F. & W. have had complete control. They have spent over 1 million dollars yearly & all they have done is make it miserable for the local people & livestock men. They have another big cover-up on the first page. They say they want to emphasize habitat quality & quantity rather than animal population. This statement is supposed to cover-up the fact that they have let the coyotes eat up a good share of the mule deer & a lot of the grouse & wild turkeys. On page 65 they blame the coyote kills on shortage of rodents. What a joke! A coyote always eats deer steak instead of mice if he can. Another lie on page 74 says livestock won't graze on steeper than 20% slope & not more than a mile from water but they have been doing it for over 100 yrs. already. This is just another gimic to cut the livestock or eliminate them. It seems that most of these plans are aimed at breaking all of the grazing permittes & thus hurting all of the business men in the towns surrounding the CMR that we spend money with & if the livestock are cut down, it will put a larger burden on the rest of the taxpayers in these 5 counties. In their "no grazing" alternatives, they also misrepresent the figures on the effect it will have. They say the direct effect would total $205,000.00 in an 8 yr. period. The figure would be closer to one million yearly and

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2.

that million dollars would mostly be spent about 3 times before the money gets out of the state. Quite an affect, I would say. They say the cut in livestock would only affect the few permit holders but the overall economy would improve due to visitations. What a joke! President Carter tells people they will have to stay home more and burn less gas, but the U.S. F. & W. know already how much money will be made by people driving & visiting. Which one are we supposed to be damn fools enough to believe? From page 62 through 66 in the "no action" plan, practically every statement is false----telling all the bad things that will be if that plan is adopted. The fact remains, that cancels all of those lies & can be proven any month of the yr, is that everyone's deeded land is used a lot harder by livestock than any of the Gov't. land . It has over 2/3 of the game & birds on it & not on the Gov't. land that is used less. Every effort has been made by the planning team to arouse every Communist group in the U.S. against the stockman that has livestock on the CMR, even though very few have seen it or know anything about it. Even though this is Gov't. land, nobody's opinion but the permit holders that live around the CMR should be considered because we are the ones that are pasturing most of the game. We are the ones that winter the wild turkeys & grouse on our feed grounds & hay stacks in hard winters. Otherwise there wouldn't be enough left for seed. We are the ones that pick up the beer cans at every gate & some on the range & we are the only ones that furnish the money! There has never been any game from the CMR seen grazing on the lawns of those people that want the livestock off of the CMR. I strongly recommend the "no action" plan or the multiple use plan with absolutely no cut in livestock. The wildlife & the local economy will both be better off that way & we'll end the trouble that the U.S. F. & W. are stirring all the time. They mention that all land issues with the Corps of Engineers must be decided in the U.S. F. & W. favor, that the State Land Board has to change their policy of not selling State School Sections & private land inside the CMR must

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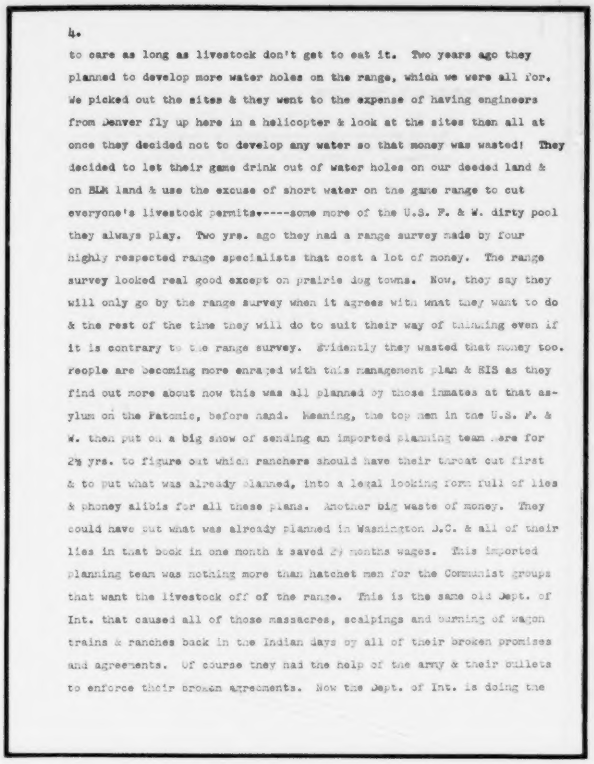
3.

be acquired. It is damned odd that the U.S. F. & W. that doesn't plan to do hardly anything right, thinks all land issues have to be decided in their favor. This is just another lever to help them finally break every rancher around the CMR. I suggest that they keep their dirty fingers out of these lands because anyone can handle the land a lot better than the U.S. F. & W. plans to handle it. The game & livestock do not & never have conflicted with each other in any way. But, if the U.S. F. & W. insist that they do, & cut the livestock, we just can't afford to run the wildlife on our private land. This whole EIS & management plan is so unrealistic that one would think it was figured out by some 10 yr. old kid that had never been out of the city. The slides the U.S. F. & W. are showing at the start of these public hearings on the proposed management plan are phoney as a seven dollar bill. They show a picture of a barren range taken this summer when it hasn't rained for 10 months and say this is the way it is now. They immediately follow with a picture of tall grass & brush that was taken last year or probably the year before when it was raining a lot & had a big growth & they say this is the way we want it to be. So do all the rest of us want it to be that way & it is every year that it rains enough in this dry country. Also they show a picture of a grouse waddling along in some tall grass & they said, "we want the vegetation tall like this so the grouse have a place to dance, make love & mate". Well I have watched grouse dancing & mating for over 50 years but have never seen them dancing & mating in the bottom of a draw in tall grass. They always do their dancing on a bare hill top. Nobody else ever saw it any different. The U.S. F.& W. just will not play the game fair & will stoop to anything as this proves, in their effort to get the livestock off of the game range & break the local people financially. Twenty thousand acres of prairie dogs seem to be what they want. Don't have any, as prairie dogs ruin every bit of vegetation. They don't seem



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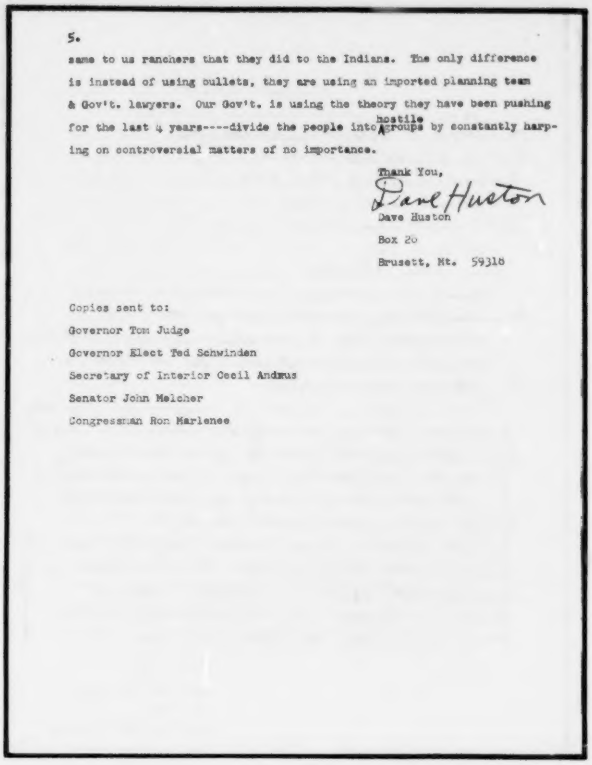
to care as long as livestock don't get to eat it. Two years ago they planned to develop more water holes on the range, which we were all for. We picked out the sites & they went to the expense of having engineers from Denver fly up here in a helicopter & look at the sites then all at once they decided not to develop any water so that money was wasted! They decided to let their game drink out of water holes on our deeded land & on BLM land & use the excuse of short water on the game range to cut everyone's livestock permits.----some more of the U.S. F. & W. dirty pool they always play. Two yrs. ago they had a range survey made by four highly respected range specialists that cost a lot of money. The range survey looked real good except on prairie dog towns. Now, they say they will only go by the range survey when it agrees with what they want to do & the rest of the time they will do to suit their way of thinking even if it is contrary to the range survey. Evidently they wasted that money too. People are becoming more enraged with this management plan & EIS as they find out more about how this was all planned by those inmates at that asylum on the Patomic, before hand. Meaning, the top men in the U.S. F. & W. then put on a big show of sending an imported planning team here for 2½ yrs. to figure out which ranchers should have their throat cut first & to put what was already planned, into a legal looking form full of lies & phoney alibis for all these plans. Another big waste of money. They could have put what was already planned in Washington D.C. & all of their lies in that book in one month & saved 29 months wages. This imported planning team was nothing more than hatchet men for the Communist groups that want the livestock off of the range. This is the same old Dept. of Int. that caused all of those massacres, scalpings and burning of wagon trains & ranches back in the Indian days by all of their broken promises and agreements. Of course they had the help of the army & their bullets to enforce their broken agreements. Now the Dept. of Int. is doing the



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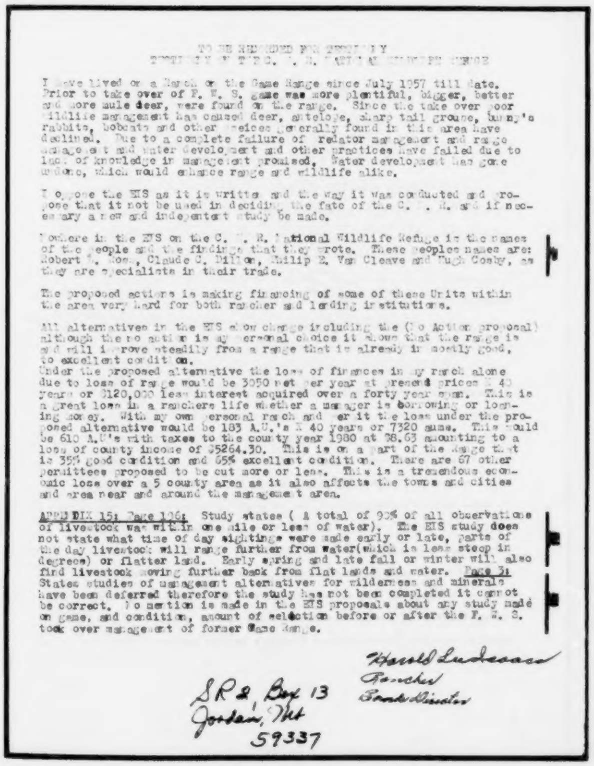
same to us ranchers that they did to the Indians. The only difference is instead of using bullets, they are using an imported planning team & Gov't. lawyers. Our Gov't. is using the theory they have been pushing for the last 4 years----divide the people into hostile groups by constantly harping on controversial matters of no importance.

Thank You,

Dave Huston

Dave Huston
Box 20
Brusett, Mt. 59318

Copies sent to:
Governor Tom Judge
Governor Elect Ted Schwinden
Secretary of Interior Cecil Andrus
Senator John Melcher
Congressman Ron Marlenee



TO BE RECORDED FOR TESTIMONY
TESTIMONY ON THE C. M. R. NATIONAL WILDLIFE RANGE

I have lived on a Ranch on the Game Range since July 1957 till date. Prior to take over of F. W. S. game was more plentiful, bigger, better and more mule deer, were found on the range. Since the take over poor wildlife management has caused deer, antelope, sharp tail grouse, bunny's rabbits, bobcats and other speices generally found in this area have declined. Due to a complete failure of predator management and range management and water development and other practices have failed due to lack of knowledge in management promised. Water development has gone undone, which would enhance range and wildlife alike.

I oppose the EIS as it is written and the way it was conducted and propose that it not be used in deciding the fate of the C. M. R. and if necessary a new and indepentent study be made.

Nowhere in the EIS on the C. M. R. National Wildlife Refuge is the names of the people and the findings that they wrote. These peoples names are: Robert L. Ross, Claude C. Dillon, Philip E. Van Cleave and Hugh Cosby, as they are specialists in their trade.

The proposed actions is making financing of some of these Units within the area very hard for both rancher and lending institutions.

All alternatives in the EIS show change including the (No Action proposal) although the no action is my personal choice it shows that the range is and will improve steadily from a range that is already in mostly good, to excellent condition.
Under the proposed alternative the loss of finances in my ranch alone due to loss of range would be 3050 net per year at present prices X 40 years or $120,000 less interest acquired over a forty year span. This is a great loss in a ranchers life whether a manager is borrowing or loaning money. With my own personal ranch and per it the loss under the proposed alternative would be 183 A.U.'s X 40 years or 7320 aums. This would be 610 A.U's with taxes to the county year 1980 at $8.63 amounting to a loss of county income of $5264.30. This is on a part of the Range that is 35% good condition and 65% excellent condition. There are 67 other permittees proposed to be cut more or less. This is a tremendous economic loss over a 5 county area as it also affects the towns and cities and area near and around the management area.

APPENDIX 15: Page 106: Study states (A total of 90% of all observations of livestock was within one mile or less of water). The EIS study does not state what time of day sightings were made early or late, parts of the day livestock will range further from water(which is less steep in degrees) or flatter land. Early spring and late fall or winter will also find livestock moving further back from flat lands and water. Page 3: States studies of management alternatives for wilderness and minerals have been deferred therefore the study has not been completed it cannot be correct. No mention is made in the EIS proposals about any study made on game, and condition, amount of selection before or after the F. W. S. took over management of former Game Range.

Harold Ludesaac
Rancher
Bank Director

SR 2, Box 13
Jordan, Mt
59337

Response to Mr. Harold Lee Isaccs

1. The listing of all consultants contracted to perform various portions of the EIS is beyond the scope of the document. The names of those consultants hired are available at the refuge headquaters, Lewistown, Montana.

2. The observations upon which the slope/water matrix were based ranged over the four seasons of the year and all daylight hours. The final figure used in the matrix is an average of all observations in a particular slope class or distance from water.

3. The wilderness inventory was completed on CMR in 1974, and the proposals are now awaiting Congressional action, thus, beyond the scope of this document. The USGS minerals report for the refuge is now completed, and no commercial development is anticipated. See Appendix 16, page 222-228, DEIS, for studies cited that were completed prior to 1976.

Mr. Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3035
316 North 26th Street
Billings, Montana 59101

Dear Mr. Steucke

Enclosed are my comments of the Draft Environmental Impact Statement for the CMR.

Alternative Plan D (multiple use) appears to be an adequate management plan for the CMR with the following recommendations.

(1) All wildfires should be suppressed as quickly as possible not only in coniferous communities but at any location on the CMR. No prescribed burning should be permitted in any coniferous communities due to the risk of losing valuable wildlife habitat and natural scenic beauty.

(2) The DEIS did not address any other natural resources other than wildlife. Under multiple use management, water and mineral resources should be considered in the event the nation should have need of these resources. 1

Sincerely,
Bob McInerney
Box 115
Fort Peck, MT 59223

Response to Mr. Bob McInerney

1. The EIS considered soil, water, vegetation, range, and wildlife resources; mineral resource consideration has been postponed pending departmental evaluation of the Geological Survey report.

Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3085
316 North 26th Street
Billings, Montana 59101

RE: Management of Charles M. Russell
National Wildlife Refuge or, a
Sixth (6th) Alternative

I am writing this paper in response to the Environment Impact Statement Draft. First I wonder if there is a need that would justify such a cut or even worse a livestock change, especially sheep, that is planned for our allotment. The draft expresses that the Big Dry, our allotment, is 85% in good to excellent condition and the other sheep allotment is 99% in good to excellent condition (Appendix 9, page 178). I was told by the range conservationist that the other 15% of my allotment was in areas of prairie dog towns, which you want to keep. It is with this sort of confusion that I answer your stated goals and objectives.

After considerable thought and review of the CMR-EIS I have come to the conclusion that the one entity in common to all interests is vegetation. Regardless of the desired product be it deer, black-footed ferrets, and or sheep, the source for each is vegetation. I have also come to the conclusion that argument over use by varied products is irresponsible and in general poor stewardship. With this understanding I would like to review some of the findings and consequences of the EIS as I understand it and as it concerns my livelihood. I would also like to recommend for my allotment a specific solution which differs from the broad "proposed action".

(1) It appears from the EIS that livestock grazing (particularly sheep) is not compatable with wildlife. Of interest in my operation is the relationship between sheep and antelope. Severson et.al (1968) indicated that sheep and antelope are compatable while Campbell's (1970) and Freeman's (1971) data suggests the opposite. Campbell (1970) stated that "66% of all pasture devoid of livestock and 66% of all pronghorns were observed in pastures not occupied by livestock. however, only 36% of the pastures not occupied by livestock were utilized by pronghorns".Other factors for non-use of pastures were pasture size, human activity, past grazing history and vegetation acting singlely or in combination of different seasons. My allotment has been surveyed for antelope five of the last eight years by the Montana Department of Fish and Game. These surveys indicate that 69% of the antelope sightings occurred on land other than CMR. I believe this information demonstrates that sheep and antelope can be compatable and that conditions other than grazing influence antelope numbers and distribution.

(2) Because of Public Land Order No. 5635 (page 32), which changed CMR from a range to refuge, CMR is now subject to the special mission of the Nation Wildlife Refuge System. I be-

lieve this places a specific responsibility on CMR to provide safeguards for migratory birds and endangered species. As stated in the EIS prairie dog towns are of particular importance for the rare and endangered black-footed ferret. They also provided suitable habitat for unique migratory birds such as burrowing owls and mountain plovers (page 45 and 50). As shown in Figure 7 (Prairie Dog Towns) a significant percentage of all prairie dog towns with CMR in Garfield County occur on my allotment. As stated in the EIS (page 42) "poor range conditions are typically associated with prairie dog towns". Only 15% of the range in my allotment was rated as "fair", all of which occurred within the vicinity of existing dog towns. This to me, appears desirable since only a small percent of land provides a significant amount of habitat for migratory birds and endangered species. As described in the no grazing alternative (page 98), "elimination of grazing and associated disturbances would mean a reduction in the number and size of prairie dog towns. As a result it would reduce habitat for such unique species as burrowing owls and mountain plovers as well as the potential success of swift fox and black-footed ferret reintroductions". Because the proposed action of the EIS stipulates dissolution of grazing by sheep on my allotment and further mandates reduction of remaining AUM's, it seems quite possible prairie dog towns could be jeopardized. This appears to be a real possibility since under current stocking rates with sheep and cattle 85% of my allotment was rated in good to excellent condition.

(3) I realize that the proposed reduction in AUM's may be necessary for some grazing allotments on the CMR because of dishonest operators, but I am not one of those operators. I've tried to be a good manager of my range and vegetation and have already voluntarily reduced my cattle from 320 to 70 and sheep from 1240 to 1000 in response to drought conditions. What I don't understand is the 17% reduction in my AUM's and the change of the livestock class, from sheep and cattle to strictly cattle, when 85% of my allotment is in good to excellent condition. The remaining 15% is in fair condition because of prairie dog towns which are being managed for by CMR. The broad recommendation of the "proposed action" is in reality penalizing the responsible operator as well as those who have violated grazing privileges.

For the above reasons I do not believe the broad based proposed action of the EIS is applicable for individual allotments, each must be considered seperately. Because all parties, CMR, BLM, Department of Fish, Wildlife and Parks, and myself have one common interest, vegetation, I recommend a bona fide rest rotation system be established. I'm not recommending a multiple use or deferred grazing system, but instead a genuine rest rotation system that considers vegetation and the needs of all the animals that are produced from that vegetation. As an individual operator it is virtually impossible for me to exist as a livestock operator under all the rules and laws by which the various agencies must operate; therefore, I solicit your and other agencies assistance to develop a rest rotation system which will meet the needs of all concerned. 1

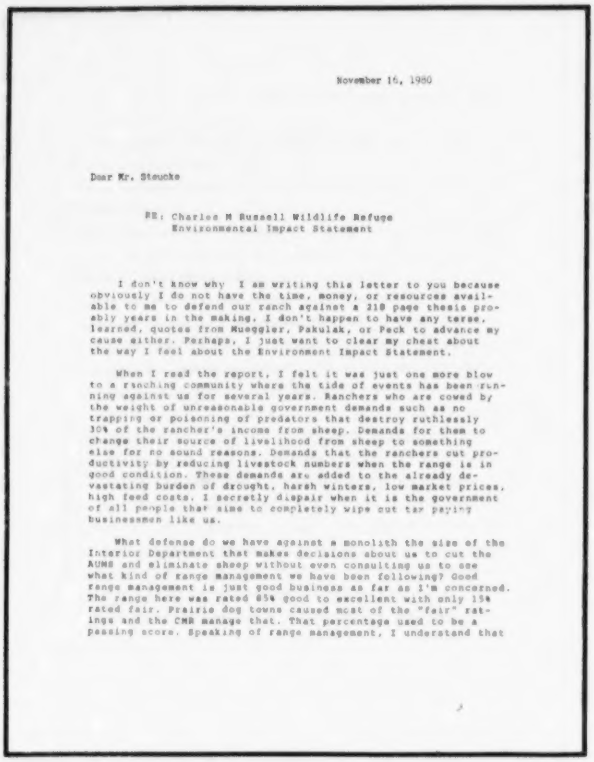
It appears to this writer that the original purpose of the game range was for the use of livestock and wildlife together. This has worked very satisfactorily in the past. If you take livestock off of the game refuge, private land should not and could not provide sufficient range for the wildlife. It is the private land surrounding and in the refuge that now winters the great majority of the refuge wildlife.

In conclusion I feel no action is necessary, but if one of the other plans has to be implemented in order to get a rest rotation system, I must support Plan D (Multiple Use) of the DEIS.

Very truly yours,
John McKerlick
John McKerlick
Jordan Mt 59337

Response to John McKerlick

1. The CMR staff will work closely with the landowners and other agencies involved in preparation of habitat management plans for each allotment or group of allotments once the final EIS is published and the Record of Decision is issued. At that time, the special concerns for individual allotments, as you have expressed, will be carefully considered.


November 16, 1980

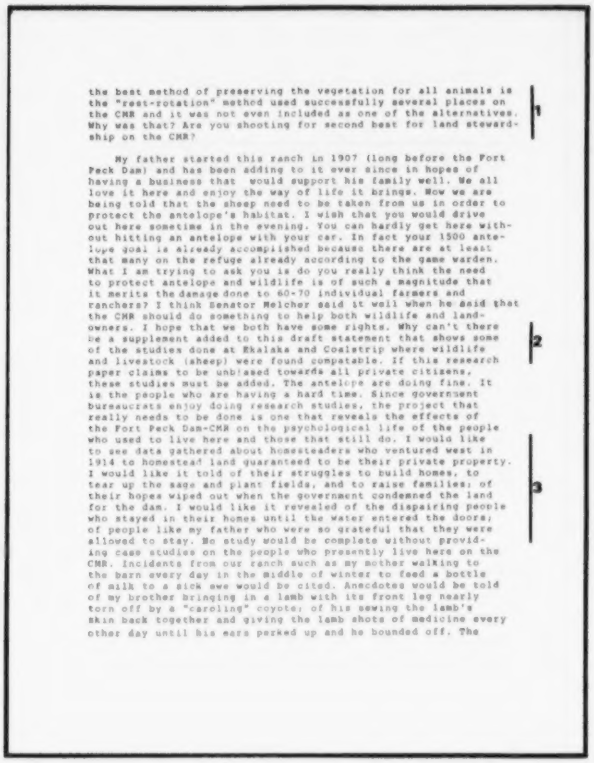
Dear Mr. Steucke

RE: Charles M Russell Wildlife Refuge
Environmental Impact Statement

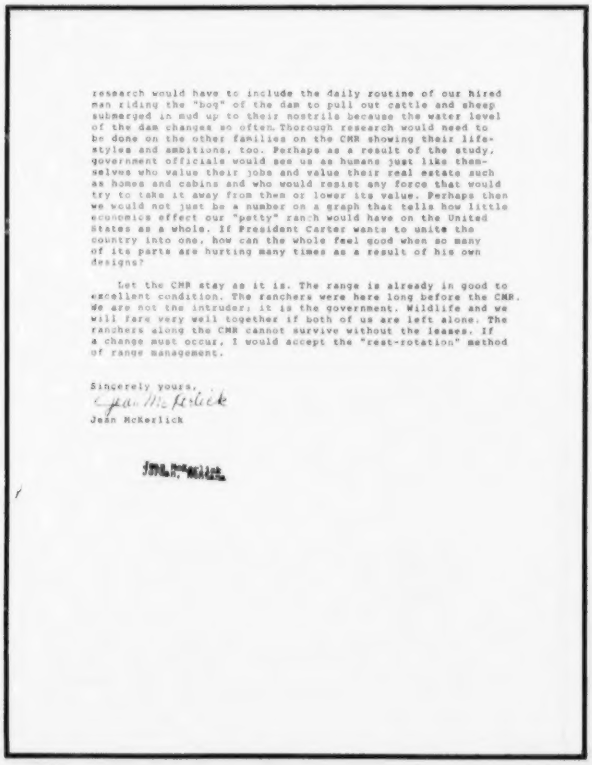
I don't know why I am writing this letter to you because obviously I do not have the time, money, or resources available to me to defend our ranch against a 218 page thesis proably years in the making. I don't happen to have any terse, learned, quotes from Mueggler, Pakulak, or Peck to advance my cause either. Perhaps, I just want to clear my chest about the way I feel about the Environment Impact Statement.

When I read the report, I felt it was just one more blow to a ranching community where the tide of events has been running against us for several years. Ranchers who are cowed by the weight of unreasonable government demands such as no trapping or poisoning of predators that destroy ruthlessly 30% of the rancher's income from sheep. Demands for them to change their source of livelihood from sheep to something else for no sound reasons. Demands that the ranchers cut productivity by reducing livestock numbers when the range is in good condition. These demands are added to the already devastating burden of drought, harsh winters, low market prices, high feed costs. I secretly dispair when it is the government of all people that aims to completely wipe out tax paying businessmen like us.

What defense do we have against a monolith the size of the Interior Department that makes decisions about us to cut the AUMS and eliminate sheep without even consulting us to see what kind of range management we have been following? Good range management is just good business as far as I'm concerned. The range here was rated 85% good to excellent with only 15% rated fair. Prairie dog towns caused most of the "fair" ratings and the CMR manage that. That percentage used to be a passing score. Speaking of range management, I understand that


the best method of preserving the vegetation for all animals is
the "rest-rotation" method used successfully several places on
the CMR and it was not even included as one of the alternatives. 1
Why was that? Are you shooting for second best for land steward-
ship on the CMR?

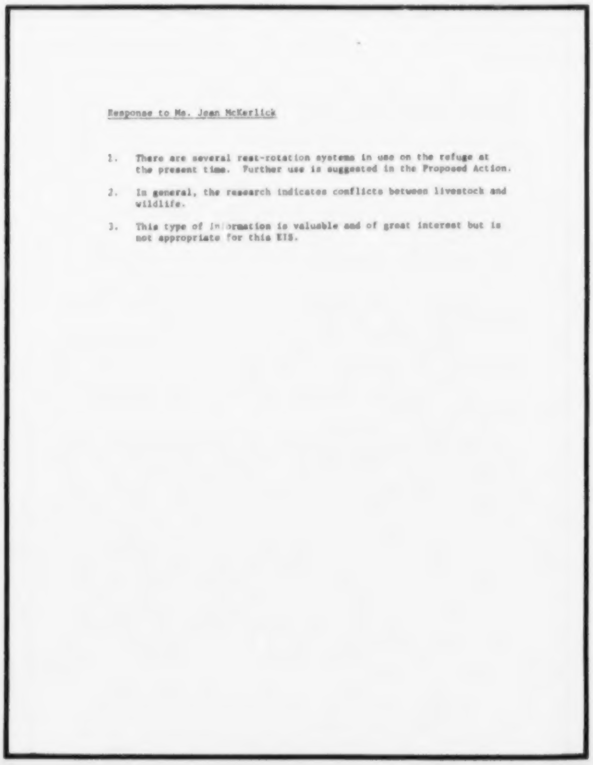
My father started this ranch in 1907 (long before the Fort
Peck Dam) and has been adding to it ever since in hopes of
having a business that would support his family well. We all
love it here and enjoy the way of life it brings. Now we are
being told that the sheep need to be taken from us in order to
protect the antelope's habitat. I wish that you would drive
out here sometime in the evening. You can hardly get here with-
out hitting an antelope with your car. In fact your 1500 ante-
lope goal is already accomplished because there are at least
that many on the refuge already according to the game warden.
What I am trying to ask you is do you really think the need
to protect antelope and wildlife is of such a magnitude that
it merits the damage done to 60-70 individual farmers and
ranchers? I think Senator Melcher said it well when he said that
the CMR should do something to help both wildlife and land-
owners. I hope that we both have some rights. Why can't there
be a supplement added to this draft statement that shows some 2
of the studies done at Ekalaka and Coalstrip where wildlife
and livestock (sheep) were found compatable. If this research
paper claims to be unbiased towards all private citizens,
these studies must be added. The antelope are doing fine. It
is the people who are having a hard time. Since government
bureaucrats enjoy doing research studies, the project that
really needs to be done is one that reveals the effects of
the Fort Peck Dam-CMR on the psychological life of the people
who used to live here and those that still do. I would like
to see data gathered about homesteaders who ventured west in
1914 to homestead land guaranteed to be their private property.
I would like it told of their struggles to build homes, to
tear up the sage and plant fields, and to raise families; of 3
their hopes wiped out when the government condemned the land
for the dam. I would like it revealed of the dispairing people
who stayed in their homes until the water entered the doors;
of people like my father who were so grateful that they were
allowed to stay. No study would be complete without provid-
ing case studies on the people who presently live here on the
CMR. Incidents from our ranch such as my mother walking to
the barn every day in the middle of winter to feed a bottle
of milk to a sick ewe would be cited. Anecdotes would be told
of my brother bringing in a lamb with its front leg nearly
torn off by a "caroling" coyote; of his sewing the lamb's
skin back together and giving the lamb shots of medicine every
other day until his ears perked up and he bounded off. The


research would have to include the daily routine of our hired man riding the "bog" of the dam to pull out cattle and sheep submerged in mud up to their nostrils because the water level of the dam changes so often. Thorough research would need to be done on the other families on the CMR showing their lifestyles and ambitions, too. Perhaps as a result of the study, government officials would see us as humans just like themselves who value their jobs and value their real estate such as homes and cabins and who would resist any force that would try to take it away from them or lower its value. Perhaps then we would not just be a number on a graph that tells how little economics effect our "petty" ranch would have on the United States as a whole. If President Carter wants to unite the country into one, how can the whole feel good when so many of its parts are hurting many times as a result of his own designs?

Let the CMR stay as it is. The range is already in good to excellent condition. The ranchers were here long before the CMR. We are not the intruder; it is the government. Wildlife and we will fare very well together if both of us are left alone. The ranchers along the CMR cannot survive without the leases. If a change must occur, I would accept the "rest-rotation" method of range management.

Sincerely yours,
Jean McKerlick
Jean McKerlick

Jean McKerlick
Jordan, Montana


Response to Ms. Jean McKerlick

1. There are several rest-rotation systems in use on the refuge at the present time. Further use is suggested in the Proposed Action.

2. In general, the research indicates conflicts between livestock and wildlife.

3. This type of information is valuable and of great interest but is not appropriate for this EIS.

COMMENT ON THE C.M. RUSSELL DRAFT ENVIRONMENTAL IMPACT STATEMENT

BY LYLE NELSON AND DARLYNE DASCHER, SOUTH ROUTE, FORT PECK, MONT.

I find the environmental impact statement totally inadequate in dealing with the changes that would take place in the communities surrounding CMR. It appears to me that the government bureaucrats have opened up a can of worms that should best be left closed. Why do the people of eastern Montana have to have action crammed down our throats by sportsmen and environmentalists in such places as Missoula, Montana, clear across the state, and Washington, D.C. clear across the country? Ranchers have struggled and made a meager living in many cases only to suddenly have book learned experts telling us how to run our business. If all the ranchers were as stupid as the range experts and environmentalists make us out to be we would have been out of business long ago. A rancher appreciates and has a deep respect for the land--his entire livehood depends upon it. There may be a few abuses of the range but they are few and far between.

I submit that this EIS is not a format of alternative actions but is a cleverly conceived plan to totally eliminate grazing, hunting and all types of recreation. With five altervatives being offered I cannot believe for a minute that the CMR is going to be swayed from its ultimate goal--NO GRAZING ON CMR.

I would like to express my comments to some of the statements found in this report.

Page viii "Although varying quantities of oil, gas and coal are known to occur beneath the rugged landscape, these and other energy resources have a low to moderate potential for development." With the energy crisis upon the U.S. today why do we have to sit upon such a vast area of natural resources and never use them? The land adjacent to the CMR is in great demand for oil, gad and coal leases.

Page ix "No threatened species of animals are known to occur in the refuge." Therefore why should such endangered species as peregrine falcons, bald eagles and possibly black-footed fettets be introduced? The CMR as it is currently called, was originally established to provide a habitat for sharptail grouse and antelope by President Frankin D. Roosevelt in 1936. It appears to me that by introducing these endangered species the CMR will become a prime candidtate for a wilderness area which we certainly has no use for.

Page x Under Proposed Action Alternative, "Significant management actions would include reduction in livestock grazing as well as changing existing livestock seasons of use and modifying existing grazing systems to benefit wildlife." I do not understand the managers of CMR thinking they can delay the rancers use of grass on the CMR and for the rancher to still survive. A student

in elementary school realizes the short and limited grazing or growing season to this area. This appears to be just another subtle approach by the CMR to put the ranchers out of business.

"Farming along the Missouri River would be phased out but some lure crop farming would be implemented to decrease elk depredation on private lands." In discussions with personel of Fish and Game as well as other individuals, they all state that it will be impossible to keep elk, deer and antelope off private land and fields. Purhaps the CMR personel are going to teach these animals to read a map and obey boundary lines!

"Federal livestock AUMs would eventually be reduced 33 percent below levels presently authorized to achieve a light grazing level determined to be consistent with wildlife objectives." How many of you could take a 33% cut in our pay and still survive. In many cases the percentage cut on an individual is closer to 50%. These ranchers face a very grim prospect of being forced out of business by the CMR. Do the wildlife pay taxes or feed the American people? No! The ranchers do.

"Some inholdings would be acquired and ownership of all lands within the CMR would be ascertained." Coed this mean they are going to condemn private lands? I always thought the constitution gave all individuals the right to earn a living in an honest and forthrite manner. How do you rationalize taking away of private lands and livihoods as being a standard of U.S. democracy? This type of action speaks very loudly of Russian tactics. All ownership of lands within the CMR can be very readily ascertained by making a simple trip to the courthouse in the county in which the land is situated.

Page xi Under the Intensive Wildlife Management Alternative you state, "Some prescribed burning would occur in Garfield county and on the west half of the refuge." Is the rancher supposed to stand by while he watches good grazing ground burn up just so nature can have her way? If we did nothing to improve our relations with nature we would still be as primitive as the pilgrim fathers. I for one would like to think we had improved our lot in life through careful management not reckless burning of lands. Who is going to stop this fire from burning private lands once it starts? If you think you can draw a line and tell the fire to stay behind it you are either very naive or have never fought a prairie fire.

Under the Multiple Use Alternative it states, "Livestock would receive approximately one-half the allocated forage." This is very poorly worded as foar as the rancher is concerned. Who is going to determine the exact amount of forage availabe? I can not believe the rancher will have any voice in this action.

Page xii Under No Grazing Alternative you state, "All private and state inholdings would have to be acquired before elimination of livestock grazing would occur since most of these areas are unfenced and stocked by the operators at carrying capacity levels."

Again I ask, are you going to condemn private land? The CMR takes the position it does not dictate what you can do with your private land but it does! Whenever any private land is inside the CMR boundary we are told exactly how many head of cattle we can run inside the CMR and if we dont like it we can just go jump in the lake.

Instead of the signs around the refuge stating "No Vehicles Beyond This Point" or "Authorized Vehicles Only" I would like to see signs saying "No Government Bureaucrats Beyond This Point."

Page 1 The EIS states, "FWS changes in grazing practices have resulted in destrust and uncertainty of CMR goals by the livestock industry and federal and state agencies." Who has caused this problem? It sure hasn't been the ranchers, hunters, fishermen or the recreationist. It appears to me the problems have all been caused by the attitudes of the CMR managers and employees. I for one am getting sick and tired of traveling great distances to attend public input hearing only to have all of the public input ignored! It lookes as though the CMR bureaucrats are going on with their plans with only a token of notice paid to the people their high and mighty decisions affect.

Page 3 Under Alternatives the EIS states, "plans for managing 15 proposed wilderness areas comprising approximately 1[illegible],000 acres on CMR will be developed after Congressional action on these areas is taken." We don't want nor do we need any more wilderness areas in Montana. Lets keep this land open to the public for all of us to use, not shut away by some congressional order. Why should the West be used constantly at the expense of the people who live here? I am getting sick and tired of the oil companies, gas companies, coal companies, electrical companies, you name it, wanting our natural resources so it can be shipped out of state to benefit some other part of the country. Why should the West have to make the sacrifice for the people of the rest of the country to have a play ground? Lets leave the area as it is so it can help pay its way in today's high inflation and tax burdened people.

Page 5 Under Wildlife objectives, "Maintain viable prairie dog towns covering between 5,000--20,000 acres on suitable areas with sizes and patterns desirable for black-footed ferrets." Why on earth do we need 20,000 acres of prairie dog towns when there has not been a reported sighting of a black-footed ferret in 2[illegible] years? If CMR managers feel they want to emprove the range conditions for wildlife in particular they should visit a large prairie dog town. A jack rabbit will pack a lunch with him when he starts across. I don't necessarily think all prairie dogs should be done away with but I sure don't see any need for even 5,000 acres of them.

I could continue to pick apart this EIS but a feeling of saving paper and time prohibits me from any further lengthy discussions of this matter.

I again state that it appears to me the CMR bureaucrats intend to implement all five of their plans rather than give the people a real choice.

If the CMR managers really wanted to work out a comprehensive plan why don't they include everyone concerned with their actions into the planning sessions? On page 104 you list the people responsible for drafting this all important statement yet I don't see a single rancher, a single mayor of towns surrounding the CMR or any cabin owners or recreationists, no hunters or fishermen---none of the people directly being affected by this statement have any input. I think it is time we get back to the founding fathers of a government of the people, by the people and for the people.

Respectfully submitted,

Lyle Nelson

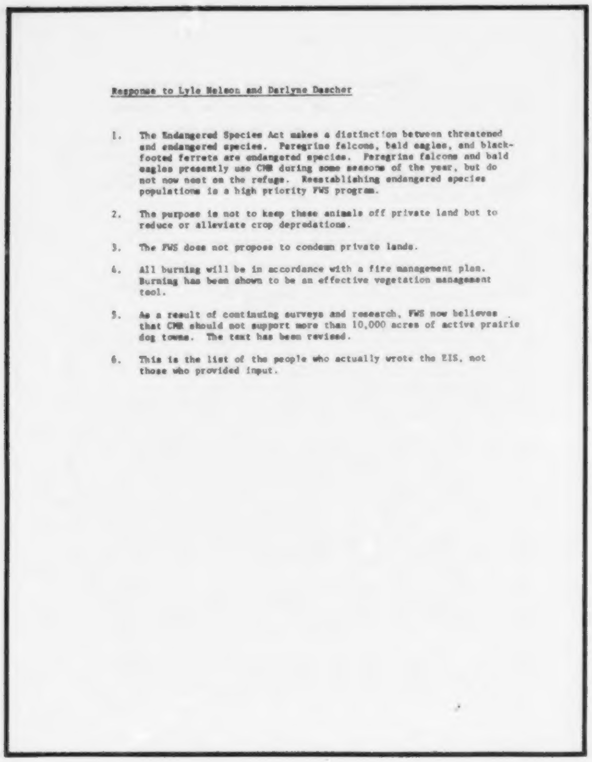
Darlyne Dascher

All quotations are taken from the Draft Environmental Impact Statement by the CMR, dated August 1980.

Copies of this statement is being sent to the following people.

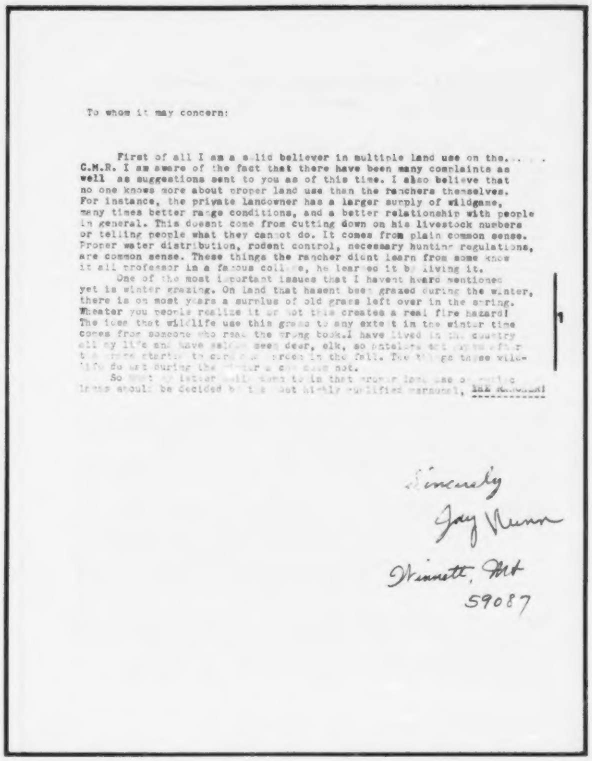
Erwin W. Steucke, Area Manager of CMR
Senator John Melcher
Senator Max Baucus
Congressman Ron Marlenee
Congressman Pat Williams

[illegible]
[illegible]
[illegible], MONT.
[illegible]



Response to Lyle Nelson and Darlyne Dascher

1. The Endangered Species Act makes a distinction between threatened and endangered species. Peregrine falcons, bald eagles, and black-footed ferrets are endangered species. Peregrine falcons and bald eagles presently use CMR during some seasons of the year, but do not now nest on the refuge. Reestablishing endangered species populations is a high priority FWS program.
2. The purpose is not to keep these animals off private land but to reduce or alleviate crop depredations.
3. The FWS does not propose to condemn private lands.
4. All burning will be in accordance with a fire management plan. Burning has been shown to be an effective vegetation management tool.
5. As a result of continuing surveys and research, FWS now believes that CMR should not support more than 10,000 acres of active prairie dog towns. The text has been revised.
6. This is the list of the people who actually wrote the EIS, not those who provided input.



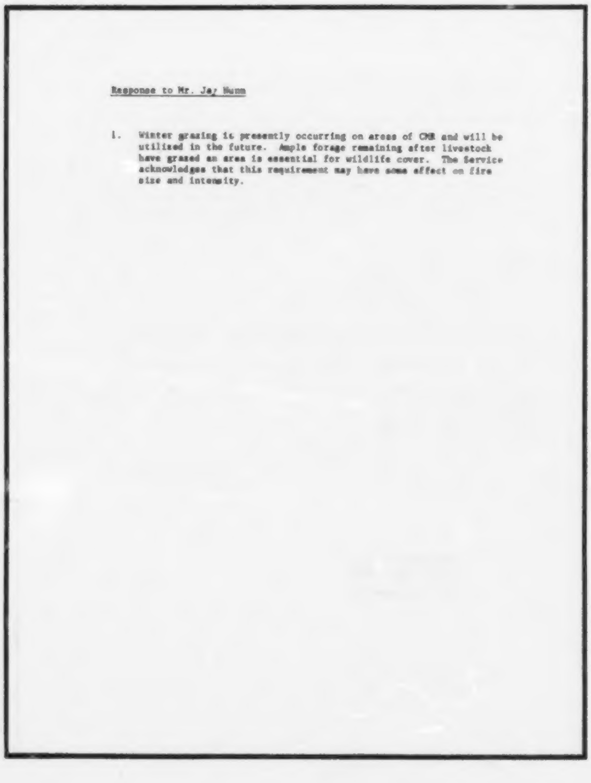
To whom it may concern:

First of all I am a solid believer in multiple land use on the C.M.R. I am aware of the fact that there have been many complaints as well as suggestions sent to you as of this time. I also believe that no one knows more about proper land use than the ranchers themselves. For instance, the private landowner has a larger surply of wildgame, many times better range conditions, and a better relationship with people in general. This doesnt come from cutting down on his livestock numbers or telling people what they cannot do. It comes from plain common sense. Proper water distribution, rodent control, necessary hunting regulations, are common sense. These things the rancher dient learn from some know it all professor in a famous college, he learned it by living it.

One of the most important issues that I havent heard mentioned yet is winter grazing. On land that hasent been grazed during the winter, there is on most years a surplus of old grass left over in the spring. Wheater you people realize it or not this creates a real fire hazard! The idea that wildlife use this grass to any extent in the winter time comes from someone who read the wrong book. I have lived in the country all my life and have seldom seen deer, elk, so antelope eat grass after the grass starts to cure and green in the fall. The things these wildlife do eat during the winter a cow does not.

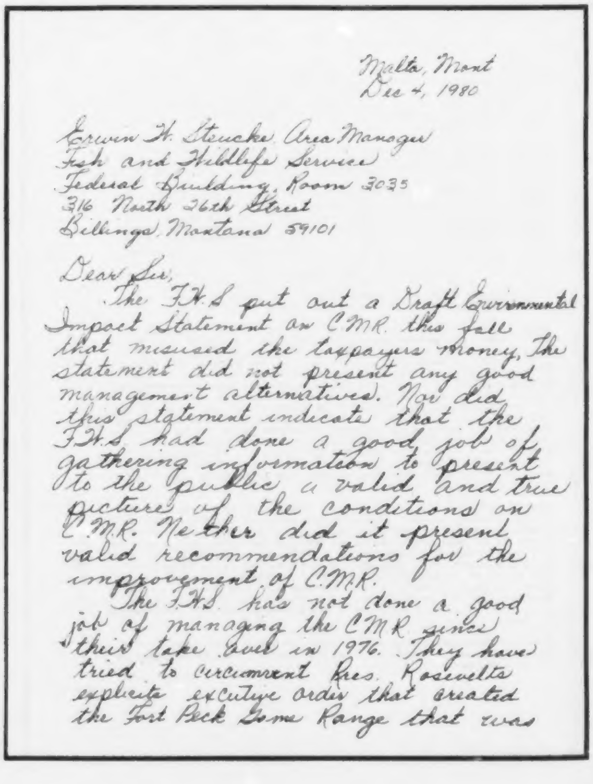
So what my letter boils down to is that proper land use on public lands should be decided by the most highly qualified personnel, THE RANCHER!

Sincerely
Jay Nunn
Winnett, Mt
59087



Response to Mr. Jay Nunn

1. Winter grazing is presently occurring on areas of CMR and will be utilized in the future. Ample forage remaining after livestock have grazed an area is essential for wildlife cover. The Service acknowledges that this requirement may have some effect on fire size and intensity.



Malta, Mont
Dec 4, 1980

Erwin H. Steucke Area Manager
Fish and Wildlife Service
Federal Building, Room 3035
316 North 26th Street
Billings, Montana 59101

Dear Sir,

The F.W.S put out a Draft Environmental Impact Statement on C.M.R. this fall that misused the taxpayers money. The statement did not present any good management alternatives. Nor did this statement indicate that the F.W.S. had done a good job of gathering information to present to the public a valid and true picture of the conditions on C.M.R. Nether did it present valid recommendations for the improvement of C.M.R.

The F.W.S. has not done a good job of managing the CMR since their take over in 1976. They have tried to circumvent Pres. Rosevelts explicite excutive order that created the Fort Peck Game Range that was later changed to C.M.R. Pres. Roosevelt created the refuge for sharp tailed grouse, antelope, and the grazing of livestock. The executive order specifically prohibited the phasing out of livestock grazing. The livestock grazing is to remain to maintain a balance on the refuge.

The number count of wildlife is not to be maintained by an over abundance of prairie dogs. The grasslands of C.M.R. has not been properly managed. The FWS has allowed the range land to become infested with prairie dogs. These prairie dogs are not good for the land even if the FWS does find some black footed ferrets to plant on the thousands of acres of wasted land in the prairie dog towns. The presidents executive order specifically says there will be no preditors introduced on C.M.R. The black footed ferret is a preditor. 1

Coyotes, bob cats and badgers are also preditors. The FWS is illegal when these preditors are allowed on C.M.R.

The FWS has not stayed within the "intent" of the excutive order and wanting to introduce another preditor, the black footed ferret, is deliberattly going against Roosevelts excutive order. 1

This rangeland on CMR is cattle grazing land. This grassland can support the wildlife and the livestock with proper management on the part of FWS. This land can not be turned over to the prairie dogs and the preditors.

Wildlife will move off the CMR if they have to eat off the old grass to get to new green grass. To burn the old grass off is a pure waste of grass and more money. The wildlife will move on to private land to graze the grass in complete compatiblity with livestock. No fence, no matter how strong or how high will hold the wildlife on the refuge. And to build & maintain a fence is unfeasible moneywise & work hour wise.

The C.M.R. needs the cattle grazing to full fill the "intent" of the executive order that created it and it needs the livestock to maintain the balance on the C.M.R.

This DEIS was made to determine the impact of grazing but it almost totally ignored grazing and how much good it, the livestock grazing impact, has on maintaining the balance of nature on the C.M.R.

Thank you

Wesley & Marlyn Orahood

M. Orahood
Malta Mont
Box 1178 - 59538

Response to Mr. and Mrs. Wesley Orahood

1. Please reread Executive Order 7509 (Appendix 4); predators are not prohibited, rather they are not mentioned.

November 28, 1980

Dear Sirs:

We would like to comment on your CMR EIS draft. First of all we want to say that we are definately against this refuge being made into a wilderness area and are for the NO ACTION proposal. We do want our 50% back that you cut us for two years for no reason since Flint's didn't use the CMR at all in "78" and only half the aum's in "77". If all us ranchers inside and out of the Boundary have to take you to court to save our homes we will.

I hope you get sued for this book because you plan to take peoples homes and you even claim deeded land. (I can't wait to watch this case). Your not going to get our home for any amount of money. Your trying to pull a Hitler trick and I hope people aren't fool enough to let you succeed.

CMR, BLM, hunters, environmentalists and Easterners always try to blame ranchers for poor land condition (gumbo will never produce) and fewer wildlife but nobody cares for this land more than ranchers because its our home. We worry more than anyone about it and all you and hunters etc. worry about is wildlife and using the land. We use it to make a living and at the same time take care of it. For two years the country has looked awful because of drought so you and BLM do your EIS's, then say ranchers overgraze. The reason theres no grass is because it hasn't rained enough the past two years to make grass.

The reason your deer and antelope decrease is because their overhunted and hunting season is during mating season. Not only that but only dumb little bucks are left and bucks are scarce as compared to the amount of does (caused by your buck only tags). Your coyotes eat the fawns because you won't let us control them. Your damn prairie dogs (which you protect and plan to increase) wreck millions of acres of grass. Cattle, wildlife and ranchers have done great together for hundreds of years and nobody had problems until CMR came along.

On pg. 87 of your EIS draft you write "private landowners outside the Boundary would be expected to receive increased demand from recreationists to hunt or travel deeded land" if you make the refuge a wilderness. If that isn't communism I never heard of it. First of all we ranchers inside the Boundary are not going to let you have our homes or wilderness and people outside won't and don't have to take in people you've run out of the refuge. Your also not going to be allowed to eliminate homes, cabins and the town of Fort Peck etc. as you say on pgs. x, xi, 18 and 19. I really hope people sue you for trying to run their private land inside and out of the refuge. On pgs. x, xi, xii, 9, 11, 18, 19, 24, 26, 84 you plan to acquire deeded land inside the refuge and say you'll condemn some to get it. Just try it you ___________ because you'll create Civil War no. 2.

This summer (fall) we were told by some of your officials that if we didn't let hunters cross our deeded land to get to your damn CMR, you'd close CMR to us and we'd possibly lose our permit. That is blackmail and from now on we don't allow anyone to go North of us because for 2 years they trespassed our neighbor even though they were told not to. One trespasser was Glenn Guenther of Fort Peck and he said he worked for you this summer. That shows how rotten you _______'s are.

I pray to God that the people, Senators etc. are smart enough to stop this wilderness and all others because its communism and wildlife are not as important as people and their homes. We like to see wildlife but when it comes to losing our homes, we wonder.

I hope that in a year or less we can wipe CMR off the map as far as control because we are trying to make an honest living and a home for our family but can't because of government.

On pgs. 27, 74, 83, and 99 you are worried that ranchers would overstock their deeded if their cut by CMR. Well, 1st of all if they did its ok because its their land not yours, and 2nd of all they wouldn't because they'd be the ones hurt the most. Ranchers aren't the dumb _____'s you want people to think. You say on pgs. 27 and 30 that putting ranchers out of business wouldn't hurt the economy and you give false figures. It would drastically hurt the economy because there would be fewer acres of agriculture and production of wheat, beef etc. and the ranchers keep towns like Jordan, Circle, Miles City etc. going because they spend their money there. You would also be hurt because you would no longer receive money for grazing and your damn wildlife have no money.

Ranchers pay the most taxes of anyone because they have more property so that would hurt the economy and the county. If ranchers get put out of business there will be no food. In your book you plan to make sheep ranchers run cattle. This is discrimination because people should be able to run what they want to and not only that, without sheep there will be no wool.

Fish and Wildlife Service thinks they can confiscate bobcat pelts if the person doesn't bring the carcass and have it in "good" condition just so they can do a damn lab test on it. Your going to get in a good lawsuit over this because these people have a trappers permit and theres no law saying you have to bring the damn carcass. Not only that but most bobcats will have been caught on deeded land so that makes it worse for you. You think you own wildlife but you'll find out you don't, they own themselves.

When we get our grazing permit from you it always has the wrong period of use than we'd like to use and we'd like to use CMR one spring and BLM the next so they'd both get a rest. You won't go for that so don't say ranchers aren't trying to manage their place the correct way because we do try, its CMR that won't allow things. For example, you harm the land worse than anyone because you won't put fires out and keep us from managing it right. In places letting a fire burn is ok but not on good grass land.

Why couldn't you simply write us a grazing permit each year according to how it would work with BLM and us then collect your grazing fees and let us run the land properly? We don't harm the land and nobody had any trouble until your strict rules came along and you start saying you'll take our homes and aum's away. People around here can take each others word and know its good but we can't even depend on your signature on a legal paper. We didn't have half as much problem with hunters either until you made people think ranchers were out to ruin the public land and kill off the precious wildlife. Its been the past five years or so that ranchers and hunters had problems and its not us that caused them.

Do you know there are not any overgrazed allotments on the "Big Dry Arm" area, they are simply droughty areas. On pg. 74 you say "there are overgrazed allotments in the "Big Dry Arm" area. On pg. 89 you say under Multiple Use proposal that "decreases in aum's would occur primarily in the "Big Dry Arm" area where most serious range condition problems occur". The only range condition problems we have here are here to stay because its gumbo and they'll never grow anything.

Pg. [illegible] says "there are poor qualities of sagebrush stands". My God you'd better get glasses because sagebrush is so thick in Haxby country that it is one reason grass can't grow.

When the Fort Peck lake was put in people (ranchers) tried telling the gov. that they were taking the best land out of production but they wouldn't listen and now they try saying ranchers took "riparian area" away from the wildlife. Now, CMR comes along and wants to do away with ranchers—the only smart people here.

Pg. 85 says "it would take 40 years of complete rest and 25 inches rain annually to make range excellent". That would mean you'd also have to keep your wildlife off it which you'd never do but you will force livestock off. It looks to me like your whole book is a pack of lies with no facts to back it up, especially when it doesn't take five years to make range excellent if you get rain. You and your range specialists must have had a great party when ya did this EIS.

Ranchers always have deer and antelope in their alfalfa and other fields and they stay with the cows for protection from coyotes, and they don't stay in the pastures we just took our livestock off of or haven't even turned into at all that year. If you close your refuge to everything but wildlife, ranchers will no longer allow wildlife to take a free meal from their land and they'll leave them lay. I hope this world wakes up pretty soon and eliminates CMR, BLM, environmentalists etc. before nobody has a home.

Why does your Boundary go around so as to include deeded land like ours for example instead of leaving deeded outside? Congress did not set up the Boundary your trying to use. Also tell me why there were CMR signs put on our deeded land and others. 1

pg. 5

We know you plan to "price us out $ per aum" but you won't succeed because theres no way we'll let you win. Tell me why Coleman Marsion got Bob Miller's CMR in his name without it being advertised. We had to have ours advertised at least 2 months even though we'd bought this place. Looks to me like there was something illegal here.

We're for "Sagebrush Rebellion" in a revised form-ranchers get grazing rights forever and hunters etc. can use it also so long as they let the rancher know who is on his leased land because we're responsible for its condition. We can't and won't let gov. win every wilderness because if we run once they'll run us out elsewhere someday! Just look how many good lands gov. has ruined and taken out of production plus taking peoples homes. Agriculture is the backbone of this world and without it theres no food, clothes etc. and no wildlife either because towns take over. Sure wish the damn lake and CMR had never existed.

Well, enough of that since you won't read this letter anyway, you'll just write in the Final Draft that "all letters were in favor of the CMR becoming a wilderness so from now on there will be no more grazing and all private land inside the Boundary will be taken". We've been thru the BLM EIS and thats what they did. I know all letters weren't for the proposed wilderness areas because us and our friends wrote letters against them.

Remember, in your Final Draft you'd better say we're against your whole damn refuge period and want to run it correctly without gov. interference.

Your endangered species-
Ranchers,

Clay Taylor
Karen Taylor

Mr. and Mrs. Clay Taylor & J.C.
Star Rte. 1 Box 22
Jordan, Montana
59337

Response to Mr. and Mrs. Clay Taylor

1. The boundary at CMR was established by Executive Order.

Brusett, Montana 59318
December 3, 1980

Area Manager
U.S. Fish and Wildlife Service
Room 3035
Federal Building
316 North 26th Avenue
Billings, Montana 59101

Dear Sir:

I am writing in regard to the E.I.S. on the Charles M. Russell Wildlife Refuge.

It would seem to me that there are several false statements in this E.I.S. such as, " the effects due to grazing changes on the C.M.R. would be insignificant under any of the alternatives", (pg.30). On page 29 it states; " Reduction of 32.4% is a reduction of 19,479 head." This constitutes a very real economic burden, not only for the ranchers involved but forthe towns that rely on agriculture for their livlihood. It is also an added tax burden for the other people of these counties. 1

Rather than cut the grazing on the Charles M. Russell it would seem much more sensible to develop the range with water such as wells, reservoirs, and springs so the cattle would spread out and not create the problemsthat the Wildlife Refuge mentions in the E.I.S. which largly do not exist. So, therefore I opt for the no action alternative.

Thank you,

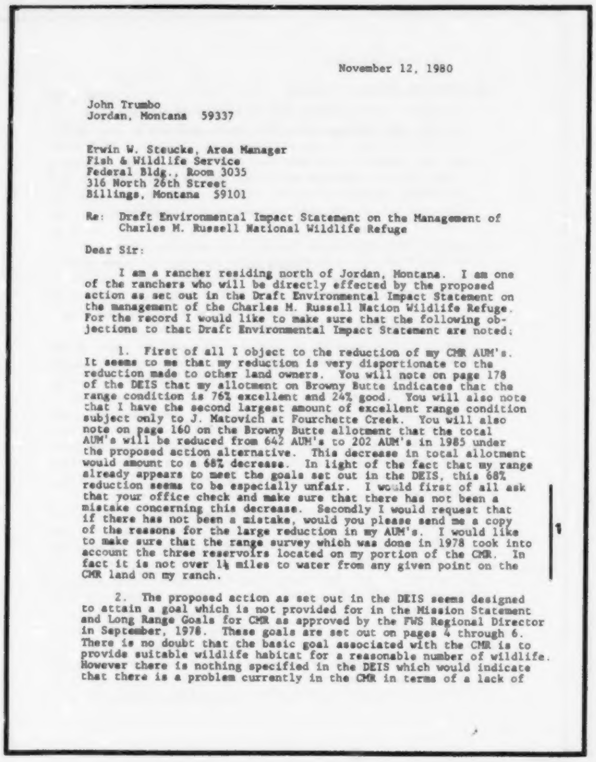
Mike Pierson

Mike Pierson
Brusett, Montana 59318

cc: Ron Marlenee (Rep)
John Melcher (Sen)

Response to Mr. Mike Pierson

1. The regional economic effects are insignificant because the relative change on the six county area is a very small percentage change. Thus, to the region, there would be no perceptible change in key economic variables such as employment or income as a result of these alternatives. The absolute effect to a few individuals, as measured without reference to the size of the six county area, may be large. While this change is important to these individuals, it does not seriously affect the human environment of the study area because the absolute changes have a small relative effect.



November 12, 1980

John Trumbo
Jordan, Montana 59337

Erwin W. Steucke, Area Manager
Fish & Wildlife Service
Federal Bldg., Room 3035
316 North 26th Street
Billings, Montana 59101

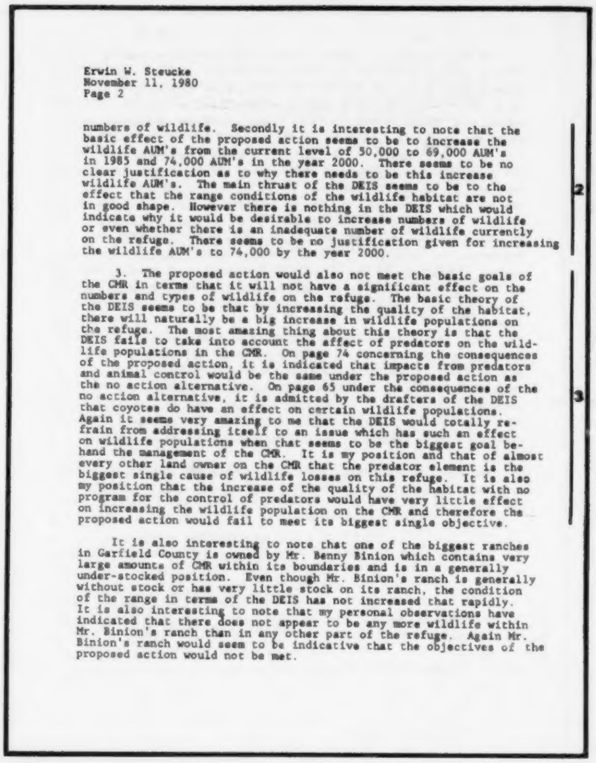
Re: Draft Environmental Impact Statement on the Management of Charles M. Russell National Wildlife Refuge

Dear Sir:

I am a rancher residing north of Jordan, Montana. I am one of the ranchers who will be directly effected by the proposed action as set out in the Draft Environmental Impact Statement on the management of the Charles M. Russell Nation Wildlife Refuge. For the record I would like to make sure that the following objections to that Draft Environmental Impact Statement are noted:

1. First of all I object to the reduction of my CMR AUM's. It seems to me that my reduction is very disportionate to the reduction made to other land owners. You will note on page 178 of the DEIS that my allotment on Browny Butte indicates that the range condition is 76% excellent and 24% good. You will also note that I have the second largest amount of excellent range condition subject only to J. Matovich at Fourchette Creek. You will also note on page 160 on the Browny Butte allotment that the total AUM's will be reduced from 642 AUM's to 202 AUM's in 1985 under the proposed action alternative. This decrease in total allotment would amount to a 68% decrease. In light of the fact that my range already appears to meet the goals set out in the DEIS, this 68% reduction seems to be especially unfair. I would first of all ask that your office check and make sure that there has not been a mistake concerning this decrease. Secondly I would request that if there has not been a mistake, would you please send me a copy of the reasons for the large reduction in my AUM's. I would like to make sure that the range survey which was done in 1978 took into account the three reservoirs located on my portion of the CMR. In fact it is not over 1¼ miles to water from any given point on the CMR land on my ranch. 1

2. The proposed action as set out in the DEIS seems designed to attain a goal which is not provided for in the Mission Statement and Long Range Goals for CMR as approved by the FWS Regional Director in September, 1978. These goals are set out on pages 4 through 6. There is no doubt that the basic goal associated with the CMR is to provide suitable wildlife habitat for a reasonable number of wildlife. However there is nothing specified in the DEIS which would indicate that there is a problem currently in the CMR in terms of a lack of

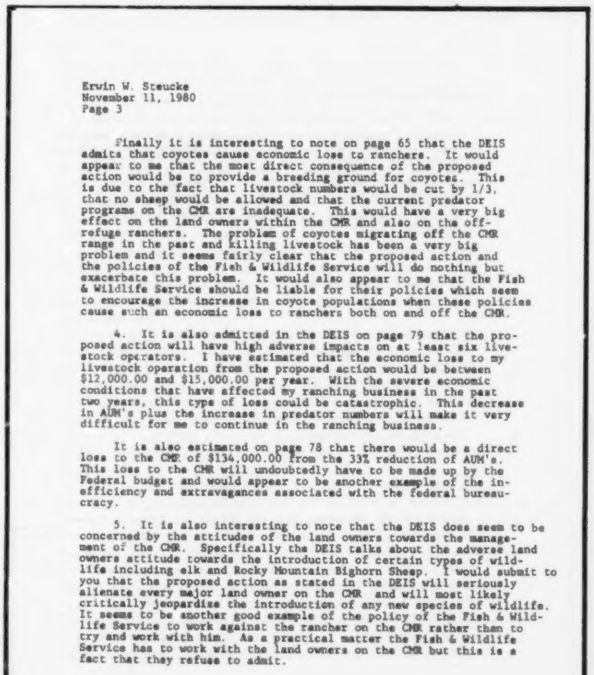


Erwin W. Steucke
November 11, 1980
Page 2

numbers of wildlife. Secondly it is interesting to note that the basic effect of the proposed action seems to be to increase the wildlife AUM's from the current level of 50,000 to 69,000 AUM's in 1985 and 74,000 AUM's in the year 2000. There seems to be no clear justification as to why there needs to be this increase wildlife AUM's. The main thrust of the DEIS seems to be to the effect that the range conditions of the wildlife habitat are not in good shape. However there is nothing in the DEIS which would indicate why it would be desirable to increase numbers of wildlife or even whether there is an inadequate number of wildlife currently on the refuge. There seems to be no justification given for increasing the wildlife AUM's to 74,000 by the year 2000. 2

3. The proposed action would also not meet the basic goals of the CMR in terms that it will not have a significant effect on the numbers and types of wildlife on the refuge. The basic theory of the DEIS seems to be that by increasing the quality of the habitat, there will naturally be a big increase in wildlife populations on the refuge. The most amazing thing about this theory is that the DEIS fails to take into account the affect of predators on the wildlife populations in the CMR. On page 74 concerning the consequences of the proposed action, it is indicated that impacts from predators and animal control would be the same under the proposed action as the no action alternative. On page 65 under the consequences of the no action alternative, it is admitted by the drafters of the DEIS that coyotes do have an effect on certain wildlife populations. Again it seems very amazing to me that the DEIS would totally refrain from addressing itself to an issue which has such an effect on wildlife populations when that seems to be the biggest goal behand the management of the CMR. It is my position and that of almost every other land owner on the CMR that the predator element is the biggest single cause of wildlife losses on this refuge. It is also my position that the increase of the quality of the habitat with no program for the control of predators would have very little effect on increasing the wildlife population on the CMR and therefore the proposed action would fail to meet its biggest single objective. 3

It is also interesting to note that one of the biggest ranches in Garfield County is owned by Mr. Benny Binion which contains very large amounts of CMR within its boundaries and is in a generally under-stocked position. Even though Mr. Binion's ranch is generally without stock or has very little stock on its ranch, the condition of the range in terms of the DEIS has not increased that rapidly. It is also interesting to note that my personal observations have indicated that there does not appear to be any more wildlife within Mr. Binion's ranch than in any other part of the refuge. Again Mr. Binion's ranch would seem to be indicative that the objectives of the proposed action would not be met.



Erwin W. Steucke
November 11, 1980
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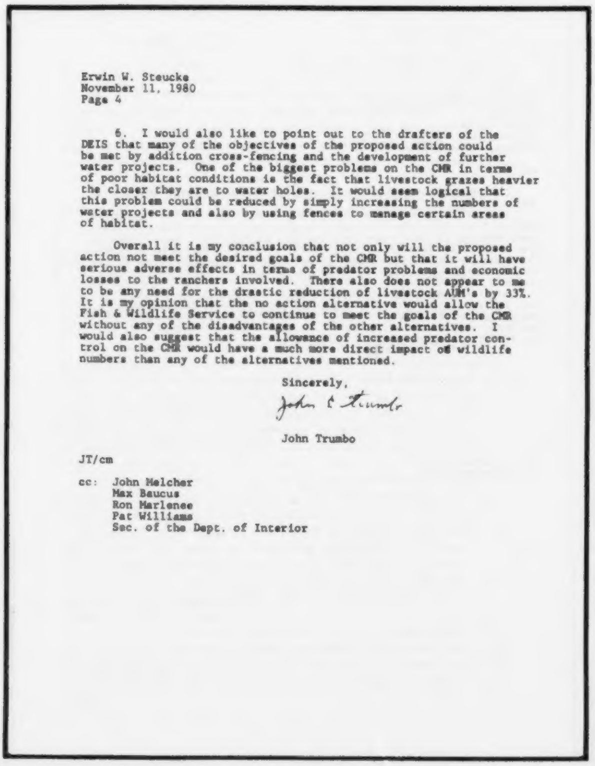
Finally it is interesting to note on page 65 that the DEIS admits that coyotes cause economic lose to ranchers. It would appear to me that the most direct consequence of the proposed action would be to provide a breeding ground for coyotes. This is due to the fact that livestock numbers would be cut by 1/3, that no sheep would be allowed and that the current predator programs on the CMR are inadequate. This would have a very big effect on the land owners within the CMR and also on the off-refuge ranchers. The problem of coyotes migrating off the CMR range in the past and killing livestock has been a very big problem and it seems fairly clear that the proposed action and the policies of the Fish & Wildlife Service will do nothing but exacerbate this problem. It would also appear to me that the Fish & Wildlife Service should be liable for their policies which seem to encourage the increase in coyote populations when these policies cause such an economic loss to ranchers both on and off the CMR.

4. It is also admitted in the DEIS on page 79 that the proposed action will have high adverse impacts on at least six livestock operators. I have estimated that the economic loss to my livestock operation from the proposed action would be between $12,000.00 and $15,000.00 per year. With the severe economic conditions that have affected my ranching business in the past two years, this type of loss could be catastrophic. This decrease in AUM's plus the increase in predator numbers will make it very difficult for me to continue in the ranching business.

It is also estimated on page 78 that there would be a direct loss to the CMR of $134,000.00 from the 33% reduction of AUM's. This loss to the CMR will undoubtedly have to be made up by the Federal budget and would appear to be another example of the inefficiency and extravagances associated with the federal bureaucracy.

5. It is also interesting to note that the DEIS does seem to be concerned by the attitudes of the land owners towards the management of the CMR. Specifically the DEIS talks about the adverse land owners attitude towards the introduction of certain types of wildlife including elk and Rocky Mountain Bighorn Sheep. I would submit to you that the proposed action as stated in the DEIS will seriously alienate every major land owner on the CMR and will most likely critically jeopardize the introduction of any new species of wildlife. It seems to be another good example of the policy of the Fish & Wildlife Service to work against the rancher on the CMR rather than to try and work with him. As a practical matter the Fish & Wildlife Service has to work with the land owners on the CMR but this is a fact that they refuse to admit.



Erwin W. Steucke
November 11, 1980
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6. I would also like to point out to the drafters of the DEIS that many of the objectives of the proposed action could be met by addition cross-fencing and the development of further water projects. One of the biggest problems on the CMR in terms of poor habitat conditions is the fact that livestock grazes heavier the closer they are to water holes. It would seem logical that this problem could be reduced by simply increasing the numbers of water projects and also by using fences to manage certain areas of habitat.

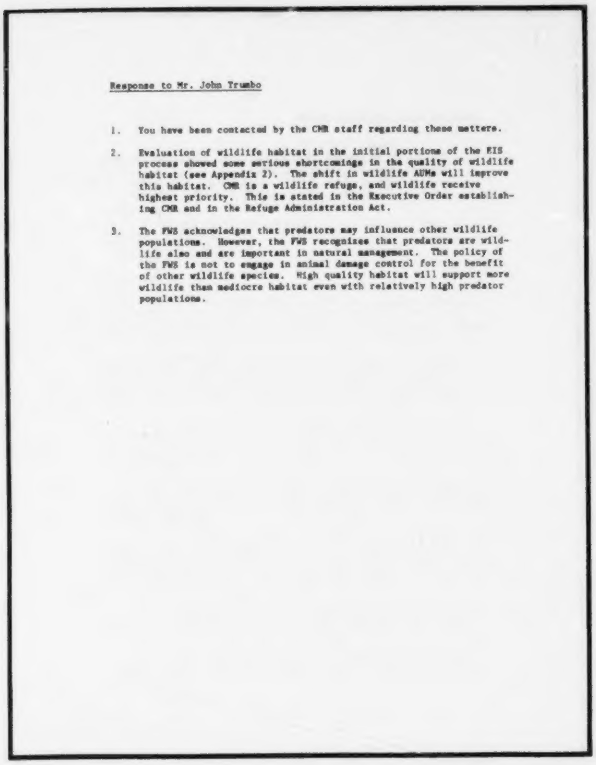
Overall it is my conclusion that not only will the proposed action not meet the desired goals of the CMR but that it will have serious adverse effects in terms of predator problems and economic losses to the ranchers involved. There also does not appear to me to be any need for the drastic reduction of livestock AUM's by 33%. It is my opinion that the no action alternative would allow the Fish & Wildlife Service to continue to meet the goals of the CMR without any of the disadvantages of the other alternatives. I would also suggest that the allowance of increased predator control on the CMR would have a much more direct impact of wildlife numbers than any of the alternatives mentioned.

Sincerely,

John Trumbo

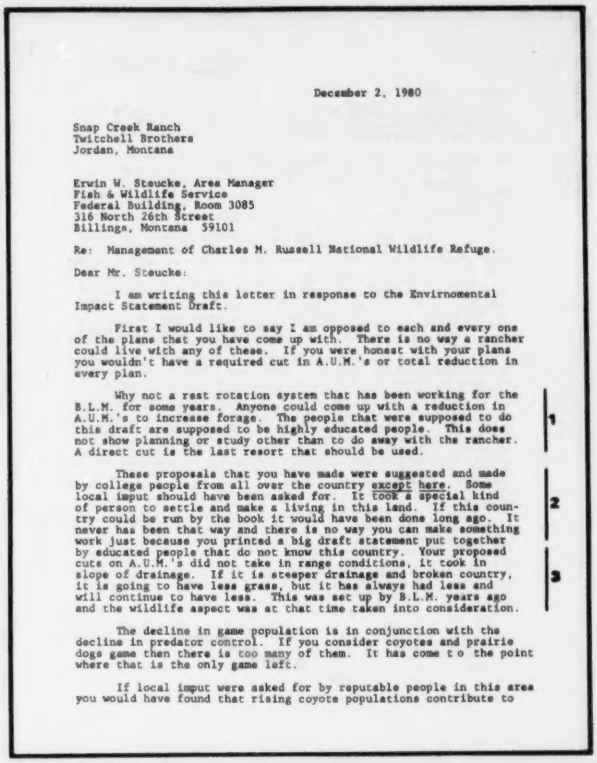
JT/cm

cc: John Melcher
Max Baucus
Ron Marlenee
Pat Williams
Sec. of the Dept. of Interior



Response to Mr. John Trumbo

1. You have been contacted by the CMR staff regarding these matters.
2. Evaluation of wildlife habitat in the initial portions of the EIS process showed some serious shortcomings in the quality of wildlife habitat (see Appendix 2). The shift in wildlife AUMs will improve this habitat. CMR is a wildlife refuge, and wildlife receive highest priority. This is stated in the Executive Order establishing CMR and in the Refuge Administration Act.
3. The FWS acknowledges that predators may influence other wildlife populations. However, the FWS recognizes that predators are wildlife also and are important in natural management. The policy of the FWS is not to engage in animal damage control for the benefit of other wildlife species. High quality habitat will support more wildlife than mediocre habitat even with relatively high predator populations.



December 2, 1980

Snap Creek Ranch
Twitchell Brothers
Jordan, Montana

Erwin W. Steucke, Area Manager
Fish & Wildlife Service
Federal Building, Room 3085
316 North 26th Street
Billings, Montana 59101

Re: Management of Charles M. Russell National Wildlife Refuge.

Dear Mr. Steucke:

I am writing this letter in response to the Envirnomental Impact Statement Draft.

First I would like to say I am opposed to each and every one of the plans that you have come up with. There is no way a rancher could live with any of these. If you were honest with your plans you wouldn't have a required cut in A.U.M.'s or total reduction in every plan.

Why not a rest rotation system that has been working for the
B.L.M. for some years. Anyone could come up with a reduction in
A.U.M.'s to increase forage. The people that were supposed to do 1
this draft are supposed to be highly educated people. This does
not show planning or study other than to do away with the rancher.
A direct cut is the last resort that should be used.

These proposals that you have made were suggested and made
by college people from all over the country except here. Some
local imput should have been asked for. It took a special kind
of person to settle and make a living in this land. If this coun- 2
try could be run by the book it would have been done long ago. It
never has been that way and there is no way you can make something
work just because you printed a big draft statement put together
by educated people that do not know this country. Your proposed
cuts on A.U.M.'s did not take in range conditions, it took in
slope of drainage. If it is steeper drainage and broken country, 3
it is going to have less grass, but it has always had less and
will continue to have less. This was set up by B.L.M. years ago
and the wildlife aspect was at that time taken into consideration.

The decline in game population is in conjunction with the decline in predator control. If you consider coyotes and prairie dogs game then there is too many of them. It has come t o the point where that is the only game left.

If local imput were asked for by reputable people in this area you would have found that rising coyote populations contribute to

December 2, 1980
Mr. Erwin W. Steucke
Page 2

the declining game population. Did you know that high coyote population for instance would sure be a sign of decreased bobcat population. "Dogs kill cats -- coyotes kill bobcats" Ask some of the reputable trappers in the area or other areas.

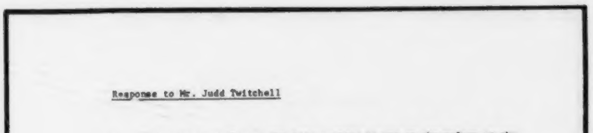
The reduction in A.U.M.'s in your proposals put such a burden on the ranchers that if you wanted to sell out no one would buy because of your proposal to buy all enclosed land within C.M.R. boundaries. It looks as though you have figured out a good way to make the rancher sell to you because no one else would buy it.

There is much more that could be said on this subject but in conclusion, I feel that no action is the best plan there is. As of the plans that were in the book you didn't leave us a choice, but a lesser of several evils. I would favor a rest rotation system which you don't have available without reductions in A.U.M.s.

Yours truly,

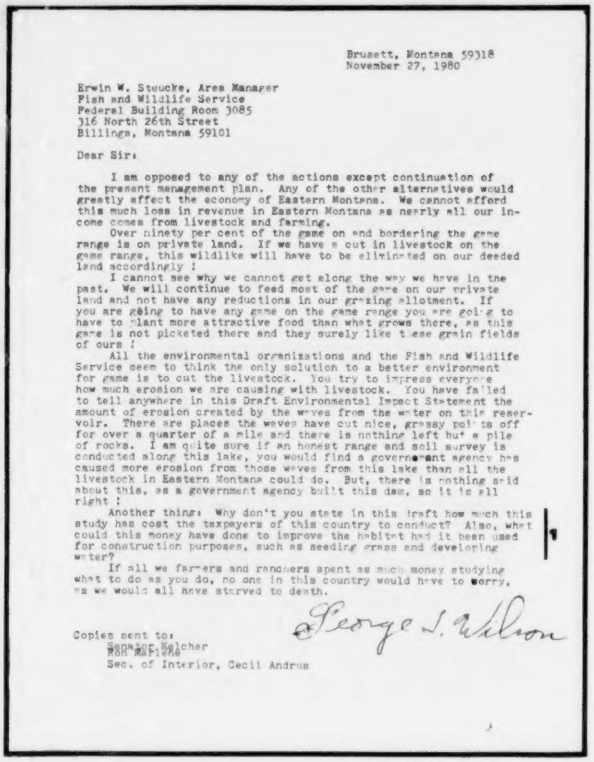
Twitchell Ranch Corp.
Judd Twitchell
Jordan, Montana 59337

JT/cm



Response to Mr. Judd Twitchell

1. There are several rest-rotation systems in use on the refuge at the present time; further use is suggested in the Proposed Action.
2. Please see pages 1 and 2 which indicate the large number of public meetings in which local comments were solicited.
3. Please see Appendix 15; range condition was the basis for the proposed rate.



Brusett, Montana 59318
November 27, 1980

Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building Room 3085
316 North 26th Street
Billings, Montana 59101

Dear Sir:

I am opposed to any of the actions except continuation of the present management plan. Any of the other alternatives would greatly affect the economy of Eastern Montana. We cannot afford this much loss in revenue in Eastern Montana as nearly all our income comes from livestock and farming.

Over ninety per cent of the game on and bordering the game range is on private land. If we have a cut in livestock on the game range, this wildlike will have to be eliminated on our deeded land accordingly !

I cannot see why we cannot get along the way we have in the past. We will continue to feed most of the game on our private land and not have any reductions in our grazing allotment. If you are going to have any game on the game range you are going to have to plant more attractive food than what grows there, as this game is not picketed there and they surely like these grain fields of ours !

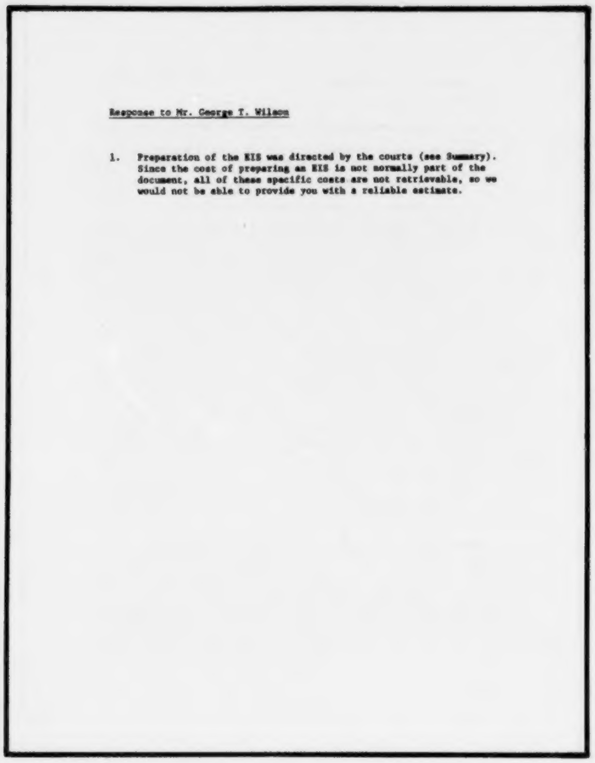
All the environmental organizations and the Fish and Wildlife Service seem to think the only solution to a better environment for game is to cut the livestock. You try to impress everyone how much erosion we are causing with livestock. You have failed to tell anywhere in this Draft Environmental Impact Statement the amount of erosion created by the waves from the water on this reservoir. There are places the waves have cut nice, grassy points off for over a quarter of a mile and there is nothing left but a pile of rocks. I am quite sure if an honest range and soil survey is conducted along this lake, you would find a government agency has caused more erosion from those waves from this lake than all the livestock in Eastern Montana could do. But, there is nothing said about this, as a government agency built this dam, so it is all right !

Another thing: Why don't you state in this draft how much this study has cost the taxpayers of this country to conduct? Also, what could this money have done to improve the habitat had it been used for construction purposes, such as seeding grass and developing water? 1

If all we farmers and ranchers spent as much money studying what to do as you do, no one in this country would have to worry, as we would all have starved to death.

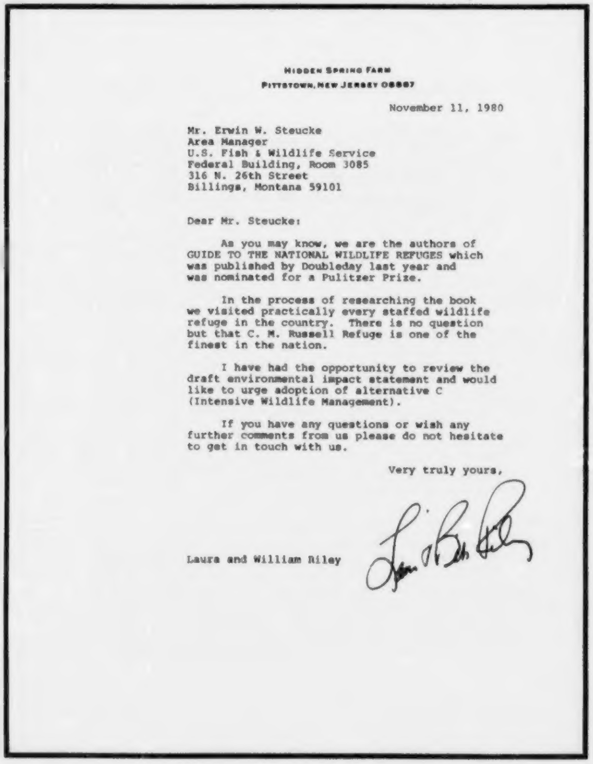
George T. Wilson

Copies sent to:
Senator Melcher
Ron Marlene
Sec. of Interior, Cecil Andrus



Response to Mr. George T. Wilson

1. Preparation of the EIS was directed by the courts (see Summary). Since the cost of preparing an EIS is not normally part of the document, all of these specific costs are not retrievable, so we would not be able to provide you with a reliable estimate.



HIDDEN SPRING FARM
PITTSTOWN, NEW JERSEY 08867

November 11, 1980

Mr. Erwin W. Steucke
Area Manager
U.S. Fish & Wildlife Service
Federal Building, Room 3085
316 N. 26th Street
Billings, Montana 59101

Dear Mr. Steucke:

As you may know, we are the authors of GUIDE TO THE NATIONAL WILDLIFE REFUGES which was published by Doubleday last year and was nominated for a Pulitzer Prize.

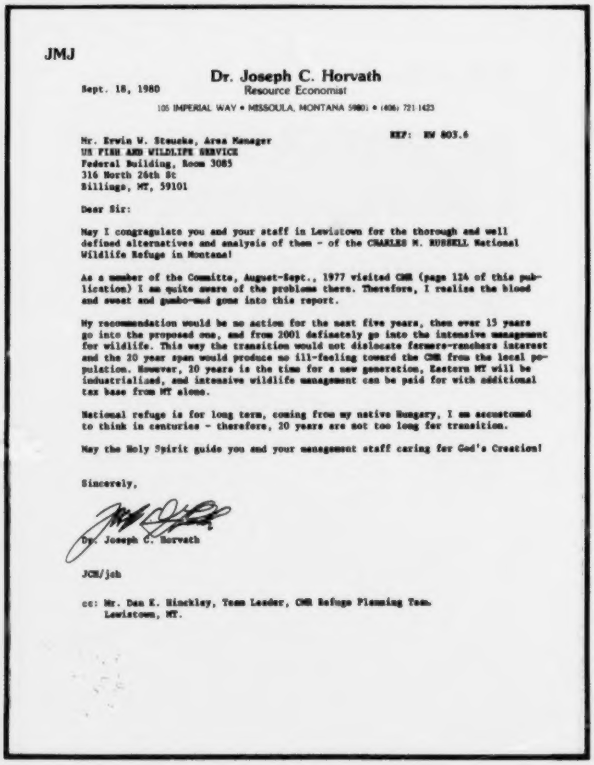
In the process of researching the book we visited practically every staffed wildlife refuge in the country. There is no question but that C. M. Russell Refuge is one of the finest in the nation.

I have had the opportunity to review the draft environmental impact statement and would like to urge adoption of alternative C (Intensive Wildlife Management).

If you have any questions or wish any further comments from us please do not hesitate to get in touch with us.

Very truly yours,

Laura and William Riley



JMJ

Dr. Joseph C. Horvath
Resource Economist
105 IMPERIAL WAY • MISSOULA, MONTANA 59801 • (406) 721-1423

Sept. 18, 1980

REF: EW 803.6

Mr. Erwin W. Steucke, Area Manager
US FISH AND WILDLIFE SERVICE
Federal Building, Room 3085
316 North 26th St
Billings, MT, 59101

Dear Sir:

May I congragulate you and your staff in Lewistown for the thorough and well defined alternatives and analysis of them - of the CHARLES M. RUSSELL National Wildlife Refuge in Montana!

As a member of the Committe, August-Sept., 1977 visited CMR (page 124 of this publication) I am quite aware of the problems there. Therefore, I realise the blood and sweat and gumbo-mud gone into this report.

My recommendation would be no action for the next five years, then over 15 years go into the proposed one, and from 2001 definately go into the intensive management for wildlife. This way the transition would not dislocate farmers-ranchers interest and the 20 year span would produce no ill-feeling toward the CMR from the local population. However, 20 years is the time for a new generation, Eastern MT will be industrialised, and intensive wildlife management can be paid for with additional tax base from MT alone.

National refuge is for long term, coming from my native Hungary, I am accustomed to think in centuries - therefore, 20 years are not too long for transition.

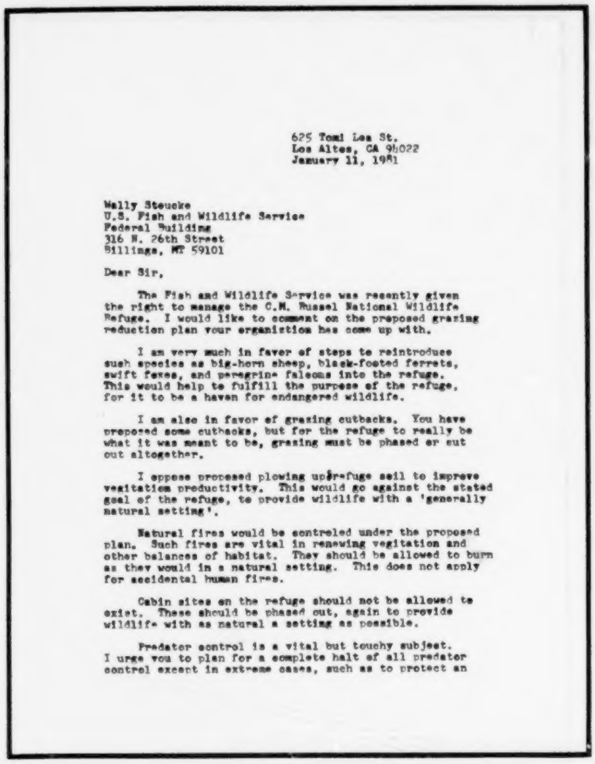
May the Holy Spirit guide you and your management staff caring for God's Creation!

Sincerely,

Dr. Joseph C. Horvath

JCH/jch

cc: Mr. Dan K. Hinckley, Team Leader, CMR Refuge Planning Team
Lewistown, MT.



625 Tomi Lea St.
Los Altos, CA 94022
January 11, 1981

Wally Steucke
U.S. Fish and Wildlife Service
Federal Building
316 N. 26th Street
Billings, MT 59101

Dear Sir,

The Fish and Wildlife Service was recently given the right to manage the C.M. Russel National Wildlife Refuge. I would like to comment on the proposed grazing reduction plan your organiztion has come up with.

I am very much in favor of steps to reintroduce such species as big-horn sheep, black-footed ferrets, swift foxes, and peregrine falcons into the refuge. This would help to fulfill the purpose of the refuge, for it to be a haven for endangered wildlife.

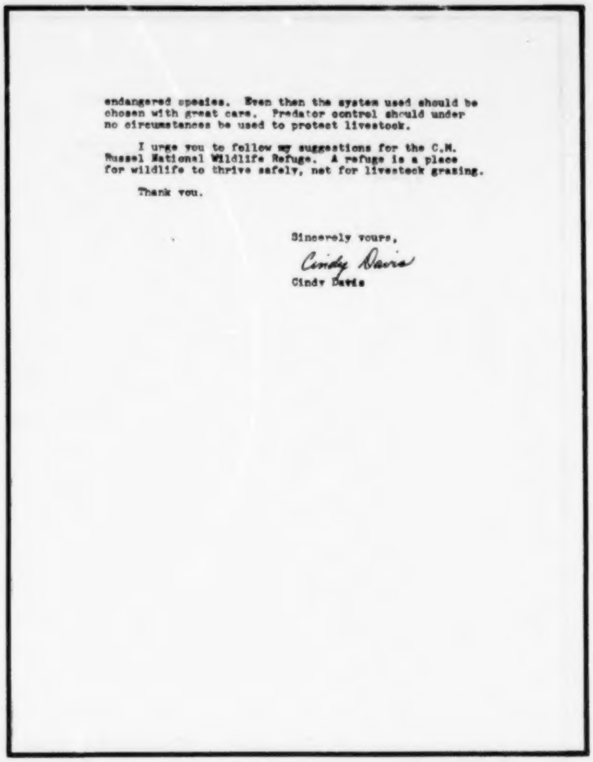
I am also in favor of grazing cutbacks. You have proposed some cutbacks, but for the refuge to really be what it was meant to be, grazing must be phased or cut out altogether.

I oppose proposed plowing up refuge soil to improve vegitation productivity. This would go against the stated goal of the refuge, to provide wildlife with a 'generally natural setting'.

Natural fires would be controled under the proposed plan. Such fires are vital in renewing vegitation and other balances of habitat. They should be allowed to burn as they would in a natural setting. This does not apply for accidental human fires.

Cabin sites on the refuge should not be allowed to exist. These should be phased out, again to provide wildlife with as natural a setting as possible.

Predator control is a vital but touchy subject. I urge you to plan for a complete halt of all predator control except in extreme cases, such as to protect an



endangered species. Even then the system used should be chosen with great care. Predator control should under no circumstances be used to protect livestock.

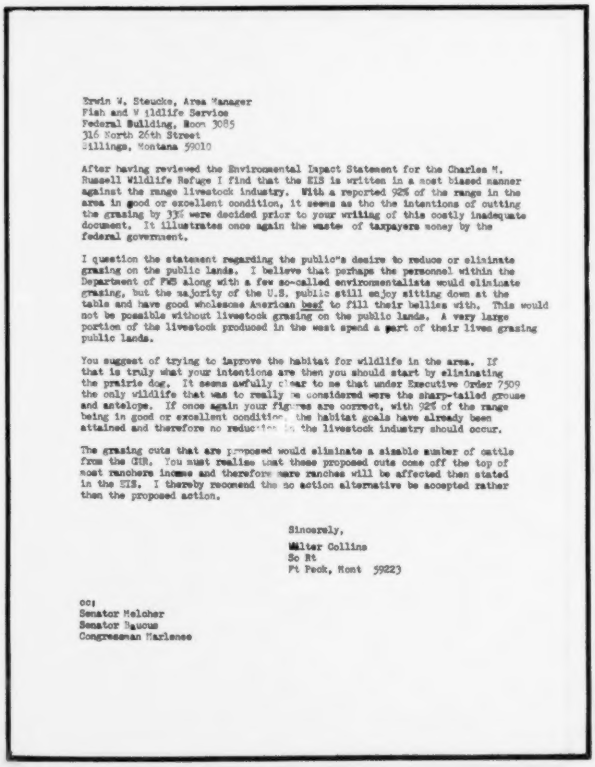
I urge you to follow my suggestions for the C.M. Russel National Wildlife Refuge. A refuge is a place for wildlife to thrive safely, not for livestock grazing.

Thank you.

Sincerely yours,

Cindy Davis

Cindy Davis



Erwin W. Steucke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3085
316 North 26th Street
Billings, Montana 59010

After having reviewed the Environmental Impact Statement for the Charles M. Russell Wildlife Refuge I find that the EIS is written in a most biased manner against the range livestock industry. With a reported 92% of the range in the area in good or excellent condition, it seems as tho the intentions of cutting the grazing by 33% were decided prior to your writing of this costly inadequate document. It illustrates once again the waste of taxpayers money by the federal government.

I question the statement regarding the public"s desire to reduce or eliminate grazing on the public lands. I believe that perhaps the personnel within the Department of FWS along with a few so-called environmentalists would eliminate grazing, but the majority of the U.S. public still enjoy sitting down at the table and have good wholesome American beef to fill their bellies with. This would not be possible without livestock grazing on the public lands. A very large portion of the livestock produced in the west spend a part of their lives grazing public lands.

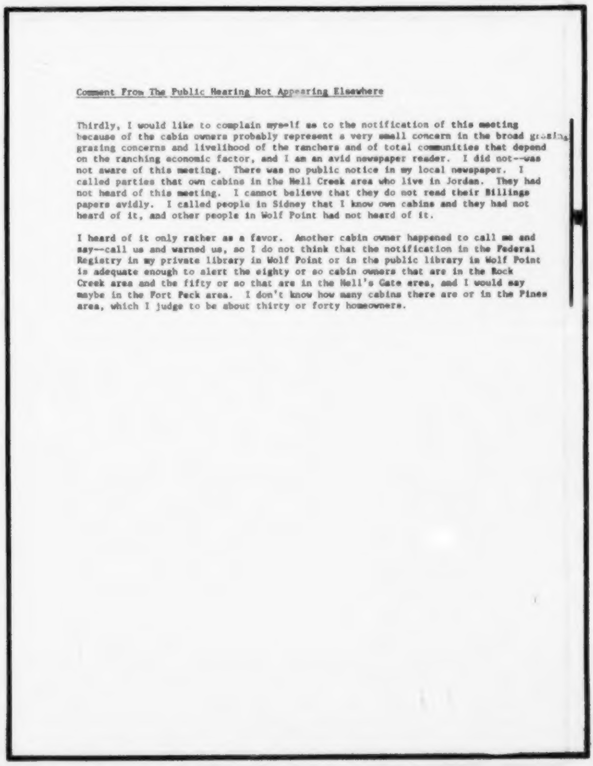
You suggest of trying to improve the habitat for wildlife in the area. If that is truly what your intentions are then you should start by eliminating the prairie dog. It seems awfully clear to me that under Executive Order 7509 the only wildlife that was to really be considered were the sharp-tailed grouse and antelope. If once again your figures are correct, with 92% of the range being in good or excellent condition, the habitat goals have already been attained and therefore no reduction in the livestock industry should occur.

The grazing cuts that are proposed would eliminate a sizable number of cattle from the CMR. You must realize that these proposed cuts come off the top of most ranchers income and therefore more ranches will be affected then stated in the EIS. I thereby recomend the no action alternative be accepted rather then the proposed action.

Sincerely,

Walter Collins
So Rt
Ft Peck, Mont 59223

cc;
Senator Melcher
Senator Baucus
Congressman Marlenee



Comment From The Public Hearing Not Appearing Elsewhere

Thirdly, I would like to complain myself as to the notification of this meeting because of the cabin owners probably represent a very small concern in the broad grazing, grazing concerns and livelihood of the ranchers and of total communities that depend on the ranching economic factor, and I am an avid newspaper reader. I did not--was not aware of this meeting. There was no public notice in my local newspaper. I called parties that own cabins in the Hell Creek area who live in Jordan. They had not heard of this meeting. I cannot believe that they do not read their Billings papers avidly. I called people in Sidney that I know own cabins and they had not heard of it, and other people in Wolf Point had not heard of it.

I heard of it only rather as a favor. Another cabin owner happened to call me and say--call us and warned us, so I do not think that the notification in the Federal Registry in my private library in Wolf Point or in the public library in Wolf Point is adequate enough to alert the eighty or so cabin owners that are in the Rock Creek area and the fifty or so that are in the Hell's Gate area, and I would say maybe in the Fort Peck area. I don't know how many cabins there are or in the Pines area, which I judge to be about thirty or forty homeowners.

Response to Comments from the Public Hearings not appearing elsewhere

1. Notice of the hearings was sent along with all EIS's distributed (over 1,200), and a news release sent to most media (TV, radio, and newspapers). In the eastern Montana area, most media publicized the hearings widely.

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X. INDEX TO LETTERS OF COMMENT FOR FEBRUARY 1984 DEIS

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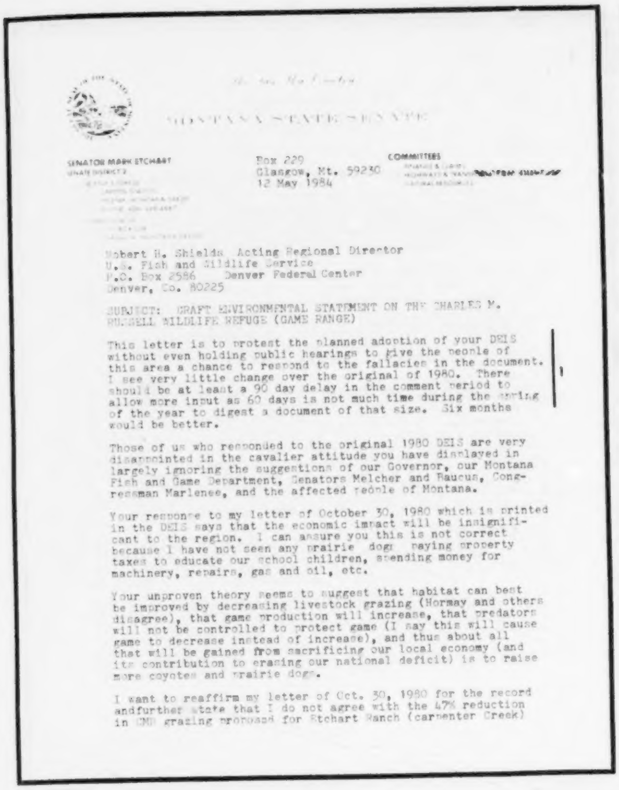
XI. PUBLIC COMMENTS AND FWS RESPONSES - FEBRUARY 1984 DEIS



MONTANA STATE SENATE

SENATOR MARK ETCHART
SENATE DISTRICT 2

Box 229
Glasgow, Mt. 59230
12 May 1984

COMMITTEES

Robert H. Shields Acting Regional Director
U.S. Fish and Wildlife Service
P.O. Box 2586 Denver Federal Center
Denver, Co. 80225

SUBJECT: DRAFT ENVIRONMENTAL STATEMENT ON THE CHARLES M. RUSSELL WILDLIFE REFUGE (GAME RANGE)

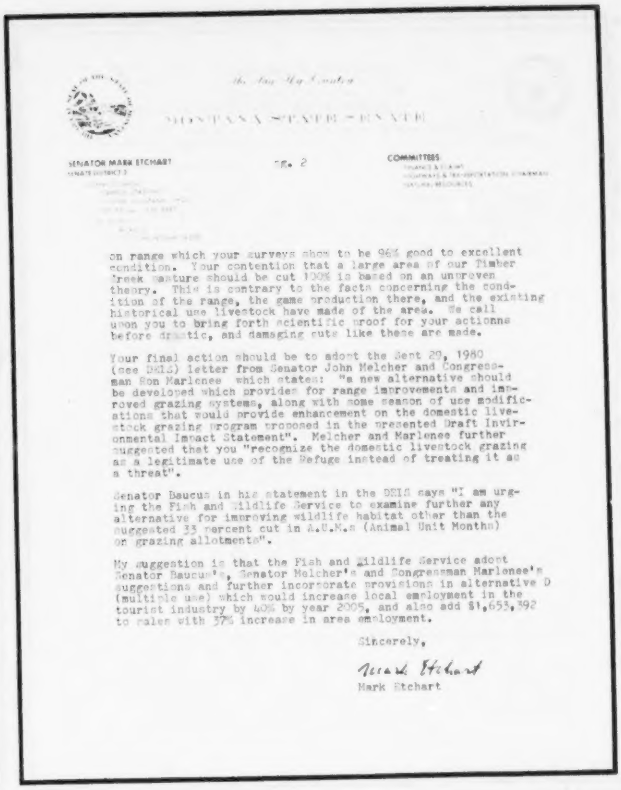
This letter is to protest the planned adoption of your DEIS without even holding public hearings to give the people of this area a chance to respond to the fallacies in the document. I see very little change over the original of 1980. There should be at least a 90 day delay in the comment period to allow more input as 60 days is not much time during the spring of the year to digest a document of that size. Six months would be better. 1

Those of us who responded to the original 1980 DEIS are very disappointed in the cavalier attitude you have displayed in largely ignoring the suggestions of our Governor, our Montana Fish and Game Department, Senators Melcher and Baucus, Congressman Marlenee, and the affected people of Montana.

Your response to my letter of October 30, 1980 which is printed in the DEIS says that the economic impact will be insignificant to the region. I can assure you this is not correct because I have not seen any prairie dogs paying property taxes to educate our school children, spending money for machinery, repairs, gas and oil, etc.

Your unproven theory seems to suggest that habitat can best be improved by decreasing livestock grazing (Hormay and others disagree), that game production will increase, that predators will not be controlled to protect game (I say this will cause game to decrease instead of increase), and thus about all that will be gained from sacrificing our local economy (and its contribution to erasing our national deficit) is to raise more coyotes and prairie dogs.

I want to reaffirm my letter of Oct. 30, 1980 for the record andfurther state that I do not agree with the 47% reduction in CMR grazing proposed for Etchart Ranch (carpenter Creek)



MONTANA STATE SENATE

SENATOR MARK ETCHART
SENATE DISTRICT 2

Pg. 2

COMMITTEES

on range which your surveys show to be 96% good to excellent condition. Your contention that a large area of our Timber Creek pasture should be cut 100% is based on an unproven theory. This is contrary to the facts concerning the condition of the range, the game production there, and the existing historical use livestock have made of the area. We call upon you to bring forth scientific proof for your actionns before drastic, and damaging cuts like these are made.

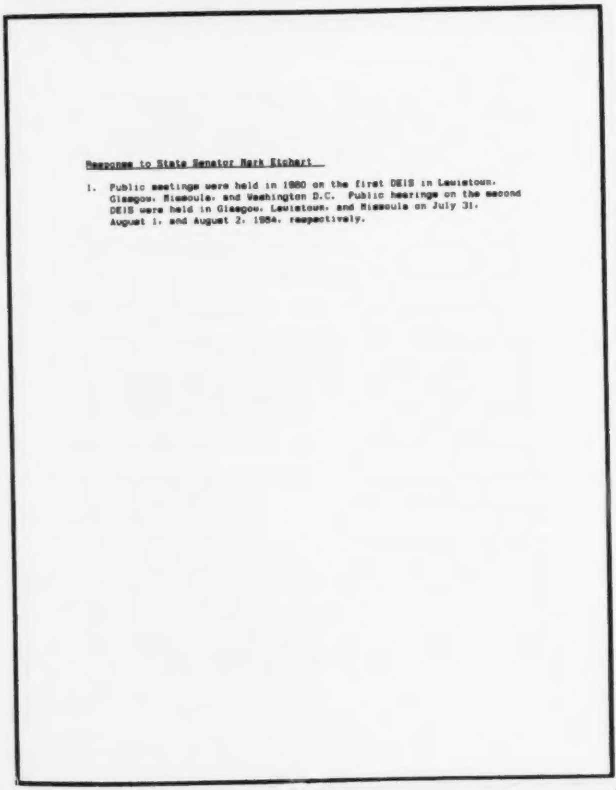
Your final action should be to adopt the Sept 29, 1980 (see DEIS) letter from Senator John Melcher and Congressman Ron Marlenee which states: "a new alternative should be developed which provides for range improvements and improved grazing systems, along with some season of use modifications that would provide enhancement on the domestic livestock grazing program proposed in the presented Draft Invironmental Impact Statement". Melcher and Marlenee further suggested that you "recognize the domestic livestock grazing as a legitimate use of the Refuge instead of treating it as a threat".

Senator Baucus in his statement in the DEIS says "I am urging the Fish and Wildlife Service to examine further any alternative for improving wildlife habitat other than the suggested 33 percent cut in A.U.M.s (Animal Unit Months) on grazing allotments".

My suggestion is that the Fish and Wildlife Service adopt Senator Baucus's, Senator Melcher's and Congressman Marlenee's suggestions and further incorporate provisions in alternative D (multiple use) which would increase local employment in the tourist industry by 40% by year 2005, and also add $1,653,392 to sales with 37% increase in area employment.

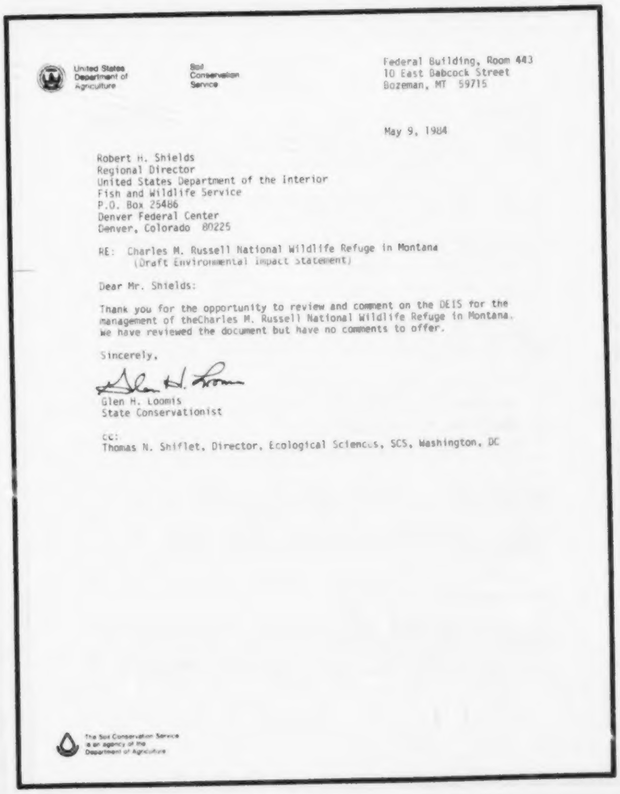
Sincerely,

Mark Etchart
Mark Etchart



Response to State Senator Mark Etchart

1. Public meetings were held in 1980 on the first DEIS in Lewistown, Glasgow, Missoula, and Washington D.C. Public hearings on the second DEIS were held in Glasgow, Lewistown, and Missoula on July 31, August 1, and August 2, 1984, respectively.



United States Department of Agriculture

Soil Conservation Service

Federal Building, Room 443
10 East Babcock Street
Bozeman, MT 59715

May 9, 1984

Robert H. Shields
Regional Director
United States Department of the Interior
Fish and Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, Colorado 80225

RE: Charles M. Russell National Wildlife Refuge in Montana
(Draft Environmental Impact Statement)

Dear Mr. Shields:

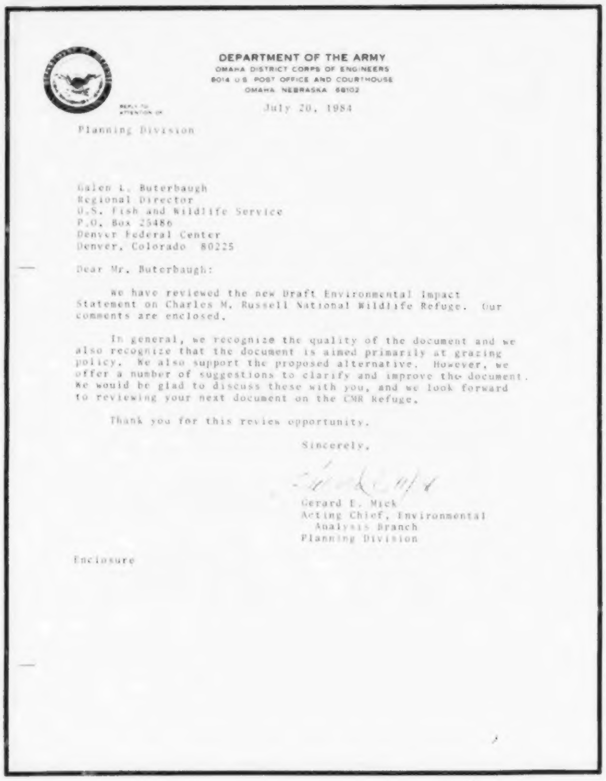
Thank you for the opportunity to review and comment on the DEIS for the management of theCharles M. Russell National Wildlife Refuge in Montana. We have reviewed the document but have no comments to offer.

Sincerely,

Glen H. Loomis
State Conservationist

cc:
Thomas N. Shiflet, Director, Ecological Sciences, SCS, Washington, DC

The Soil Conservation Service is an agency of the Department of Agriculture



DEPARTMENT OF THE ARMY
OMAHA DISTRICT CORPS OF ENGINEERS
6014 U.S. POST OFFICE AND COURTHOUSE
OMAHA, NEBRASKA 68102

REPLY TO
ATTENTION OF

July 20, 1984

Planning Division

Galen L. Buterbaugh
Regional Director
U.S. Fish and Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Mr. Buterbaugh:

We have reviewed the new Draft Environmental Impact Statement on Charles M. Russell National Wildlife Refuge. Our comments are enclosed.

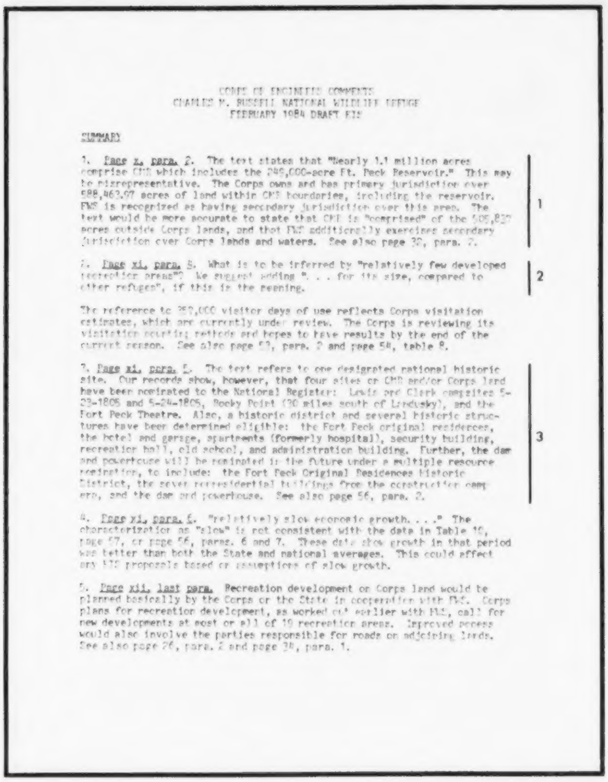
In general, we recognize the quality of the document and we also recognize that the document is aimed primarily at grazing policy. We also support the proposed alternative. However, we offer a number of suggestions to clarify and improve the document. We would be glad to discuss these with you, and we look forward to reviewing your next document on the CMR Refuge.

Thank you for this review opportunity.

Sincerely,

Gerard E. Mick
Acting Chief, Environmental
Analysis Branch
Planning Division

Enclosure



CORPS OF ENGINEERS COMMENTS
CHARLES M. RUSSELL NATIONAL WILDLIFE REFUGE
FEBRUARY 1984 DRAFT EIS

SUMMARY

1. Page x, para. 2. The text states that "Nearly 1.1 million acres comprise CMR which includes the 249,000-acre Ft. Peck Reservoir." This may be misrepresentative. The Corps owns and has primary jurisdiction over 588,463.97 acres of land within CMR boundaries, including the reservoir. FWS is recognized as having secondary jurisdiction over this area. The text would be more accurate to state that CMR is "comprised" of the 505,837 acres outside Corps lands, and that FWS additionally exercises secondary jurisdiction over Corps lands and waters. See also page 32, para. 2. 1

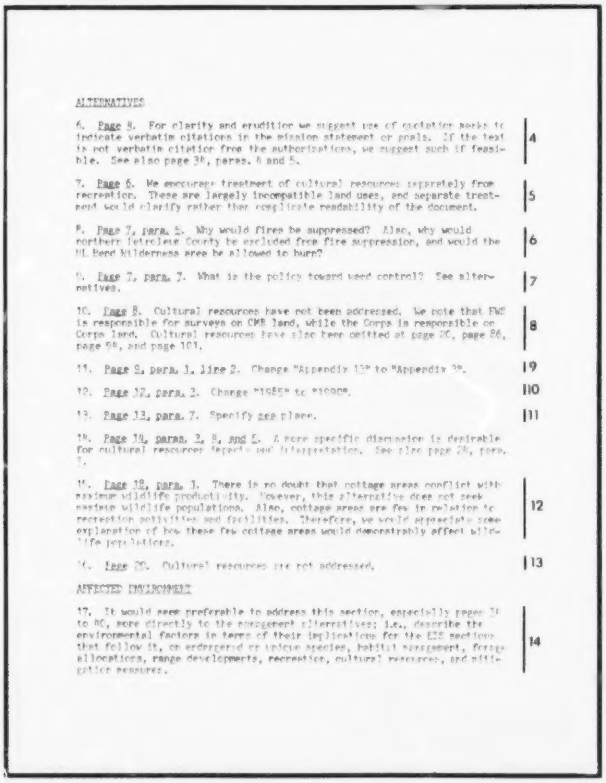
2. Page xi, para. 5. What is to be inferred by "relatively few developed recreation areas"? We suggest adding ". . . for its size, compared to other refuges", if this is the meaning. 2

The reference to 257,000 visitor days of use reflects Corps visitation estimates, which are currently under review. The Corps is reviewing its visitation counting methods and hopes to have results by the end of the current season. See also page 53, para. 2 and page 54, table 8.

3. Page xi, para. 5. The text refers to one designated national historic site. Our records show, however, that four sites on CMR and/or Corps land have been nominated to the National Register: Lewis and Clark campsites 5-23-1805 and 5-24-1805, Rocky Point (30 miles south of Landusky), and the Fort Peck Theatre. Also, a historic district and several historic structures have been determined eligible: the Fort Peck original residences, the hotel and garage, apartments (formerly hospital), security building, recreation hall, old school, and administration building. Further, the dam and powerhouse will be nominated in the future under a multiple resource nomination, to include: the Fort Peck Original Residences Historic District, the seven nonresidential buildings from the construction camp era, and the dam and powerhouse. See also page 56, para. 2. 3

4. Page xi, para. 6. "relatively slow economic growth. . . ." The characterization as "slow" is not consistent with the data in Table 10, page 57, or page 56, paras. 6 and 7. These data show growth in that period was better than both the State and national averages. This could affect any EIS proposals based on assumptions of slow growth.

5. Page xii, last para. Recreation development on Corps land would be planned basically by the Corps or the State in cooperation with FWS. Corps plans for recreation development, as worked out earlier with FWS, call for new developments at most or all of 19 recreation areas. Improved access would also involve the parties responsible for roads on adjoining lands. See also page 26, para. 2 and page 34, para. 1.



ALTERNATIVES

6. Page 5. For clarity and erudition we suggest use of quotation marks to indicate verbatim citations in the mission statement or goals. If the text is not verbatim citation from the authorizations, we suggest such if feasible. See also page 34, paras. 4 and 5. 4

7. Page 6. We encourage treatment of cultural resources separately from recreation. These are largely incompatible land uses, and separate treatment would clarify rather than complicate readability of the document. 5

8. Page 7, para. 5. Why would fires be suppressed? Also, why would northern Petroleum County be excluded from fire suppression, and would the UL Bend Wilderness area be allowed to burn? 6

9. Page 7, para. 7. What is the policy toward weed control? See alternatives. 7

10. Page 8. Cultural resources have not been addressed. We note that FWS is responsible for surveys on CMR land, while the Corps is responsible on Corps land. Cultural resources have also been omitted at page 20, page 86, page 94, and page 101. 8

11. Page 9, para. 1, line 2. Change "Appendix 12" to "Appendix 3". 9

12. Page 12, para. 2. Change "1985" to "1990". 10

13. Page 13, para. 7. Specify age plans. 11

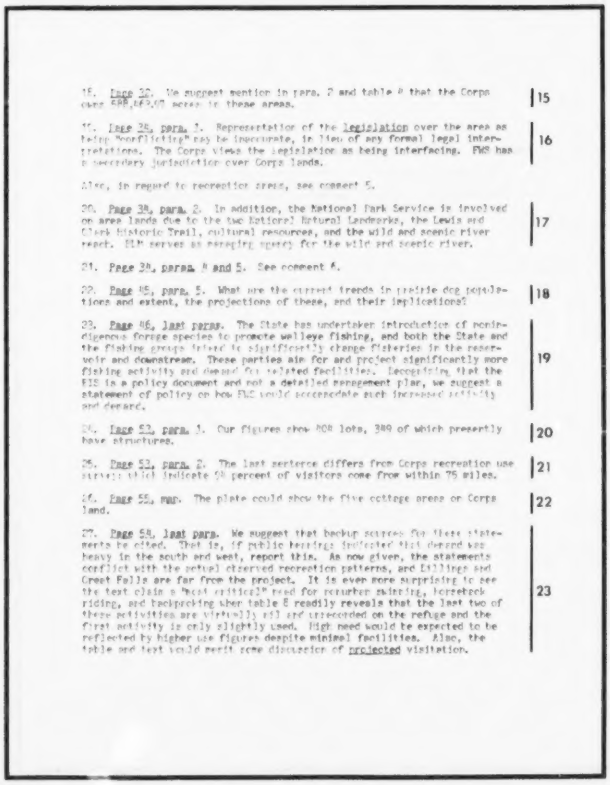
14. Page 14, paras. 3, 4, and 5. A more specific discussion is desirable for cultural resources impacts and interpretation. See also page 24, para. 7.

15. Page 18, para. 1. There is no doubt that cottage areas conflict with maximum wildlife productivity. However, this alternative does not seek maximum wildlife populations. Also, cottage areas are few in relation to recreation activities and facilities. Therefore, we would appreciate some explanation of how these few cottage areas would demonstrably affect wildlife populations. 12

16. Page 20. Cultural resources are not addressed. 13

AFFECTED ENVIRONMENT

17. It would seem preferable to address this section, especially pages 24 to 40, more directly to the management alternatives; i.e., describe the environmental factors in terms of their implications for the EIS sections that follow it, on endangered or unique species, habitat management, forage allocations, range developments, recreation, cultural resources, and mitigation measures. 14



18. Page 32. We suggest mention in para. 2 and table 4 that the Corps owns 588,463.97 acres in these areas. 15

19. Page 34, para. 3. Representation of the legislation over the area as being "conflicting" may be inaccurate, in lieu of any formal legal interpretations. The Corps views the legislation as being interfacing. FWS has a secondary jurisdiction over Corps lands. 16

Also, in regard to recreation areas, see comment 5.

20. Page 38, para. 2. In addition, the National Park Service is involved on area lands due to the two National Natural Landmarks, the Lewis and Clark Historic Trail, cultural resources, and the wild and scenic river reach. BLM serves as managing agency for the wild and scenic river. 17

21. Page 34, paras. 4 and 5. See comment 6.

22. Page 45, para. 5. What are the current trends in prairie dog populations and extent, the projections of these, and their implications? 18

23. Page 46, last paras. The State has undertaken introduction of nonindigenous forage species to promote walleye fishing, and both the State and the fishing groups intend to significantly change fisheries in the reservoir and downstream. These parties aim for and project significantly more fishing activity and demand for related facilities. Recognizing that the EIS is a policy document and not a detailed management plan, we suggest a statement of policy on how FWS would accommodate such increased activity and demand. 19

24. Page 52, para. 1. Our figures show 404 lots, 389 of which presently have structures. 20

25. Page 53, para. 2. The last sentence differs from Corps recreation use surveys which indicate 59 percent of visitors come from within 75 miles. 21

26. Page 55, map. The plate could show the five cottage areas on Corps land. 22

27. Page 54, last para. We suggest that backup sources for these statements be cited. That is, if public hearings indicated that demand was heavy in the south and west, report this. As now given, the statements conflict with the actual observed recreation patterns, and Billings and Great Falls are far from the project. It is even more surprising to see the text claim a "most critical" need for nonurban skiing, horseback riding, and backpacking when table 8 readily reveals that the last two of these activities are virtually nil and unrecorded on the refuge and the first activity is only slightly used. High need would be expected to be reflected by higher use figures despite minimal facilities. Also, the table and text would merit some discussion of projected visitation. 23

28. Page 56, para. 2. See comment 3.

29. Page 56, paras. 4 through 7. See comment 4. 24

30. Page 59, para. 9. The first sentence seems unrelated to those following it. 25

31. Page 65, para. 1. Fire tolerance of plant species was not described under "Affected Environment"; see comment 18. All discussions of burning and wildfires are made without a description of plant tolerance and other factors related to fire management; see esp. page 11, last para. 26

32. Page 69, para. 5, last two sentences. How were these statements arrived at? 27

33. Page 77, para. 4. Any prohibition of new recreation areas and related developments inside the Corps boundary would be determined by the Corps in coordination and cooperation with FWS. We will continue to work with FWS for resource management.

Please identify any known long-term areas of "sensitive wildlife habitat". 28

34. Page 94, para. 6. Increased destruction and vandalism to cultural resources would also result. 29

OTHER

35. Is it not appropriate to include a thorough explanation of mineral development policy? What are the policies under each alternative for drilling, mining, and excavation? And what are the impacts under "Environmental Consequences" for each of these? The discussion under "Affected Environment" of coal and oil and gas implies these are subject to development. See also comment 18. 30

36. We note little or no mention of Lewis and Clark National Historic Trail. The Trail may tie in well with other attractions in the area and may be related to the recreation demands cited on page 54, last paragraph. We suggest discussion of this potential. 31

37. We support the habitat improvement approach that the FWS uses in management of the refuge. The proposed action alternative is endorsed. The "no action alternative," "no grazing alternative," and "the multiple use alternative" restrict the kinds of habitat manipulation techniques needed to improve the refuge's habitat quality. The "intensive wildlife management alternative" is desirable from a wildlife aspect but undesirable for recreation activities because of the limitations it would impose.

Response to Dept. of the Army, Corps of Engineers

Thank you for your careful review. Your comments have improved the accuracy and completeness of the EIS.

1. Text has been revised.

2. Text has been revised.

3. The text on page 63 has been revised.

4. Text has been revised.

5. Text has been expanded.

6. Text has been revised.

8. Text has been expanded.

9. Text has been revised.

10. Text has been revised.

11. Text has been revised.

12. Because "cottage areas conflict with maximum wildlife productivity", FWS believes their removal is consistent with an intensive wildlife management alternative.

13. Text has been revised.

14. FWS attempted to write the Affected Environment in accordance with Section 1502.15 of the Federal Register on preparation of EIS's.

15. The text has been revised.

16. The text has been revised.

17. Text has been expanded.

18. Text has been updated to provide latest prairie dog figures.

19. Text has been expanded.

20. Text has been corrected.

21. FWS conducted a recreational survey in 1978. Results are summarized in Table 8, page 61.

---

22. Figure 8 has been revised to show cottage sites.

23. The text has been clarified. Sources are cited towards the end of the last paragraph, page 61. Projected recreational uses are discussed in the section on Consequences, starting on page 78.

24. The text has been corrected.

25. The sentence has been deleted.

26. Detailed discussion of subjects such as tolerance to fire of plant species is beyond the scope of this document.

27. Text has been revised.

28. Presently known sensitive areas have been identified. No recreational developments have been planned that would conflict with wildlife in these areas.

29. Text has been expanded.

30. An application for withdrawal of mineral leasing and development of CMR is presently being processed. A mineral survey of CMR that was released in 1979 is summarized on page 41. FWS has regulations and restrictions on leasing and development of minerals, oil, and gas to protect wildlife. These apply to CMR. However, any current outstanding leases will be honored. The concern for minerals and oil and gas are not highlighted in the EIS because their treatment would be the same for all alternatives.

31. The text has been amended.

United States
Environmental Protection
Agency

Region 8 Montana Office
Federal Building
301 S. Park Drawer 10096
Helena, Montana 59626

EPA

AUG 1 3 1984

Ref: 8MO

Mr. Robert A. Shields
Regional Director
U. S. Fish and Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Mr. Shields:

We have completed our review of your agency's new draft environmental impact statement on the management of the Charles M. Russell National Wildlife Refuge in Montana. We found the EIS to be well-written and objective in its handling of the various management options.

This agency does not generally become involved in wildlife issues but are directly involved with land management as it effects water quality. For this reason, we can only support your recommended management alternative and its obvious water quality benefits. As the the EIS points out, many of the areas in the refuge now being heavily grazed by livestock may also be contributing large amounts of sediment to the Missouri River watershed. Your proposal will be a significant improvement over this situation.

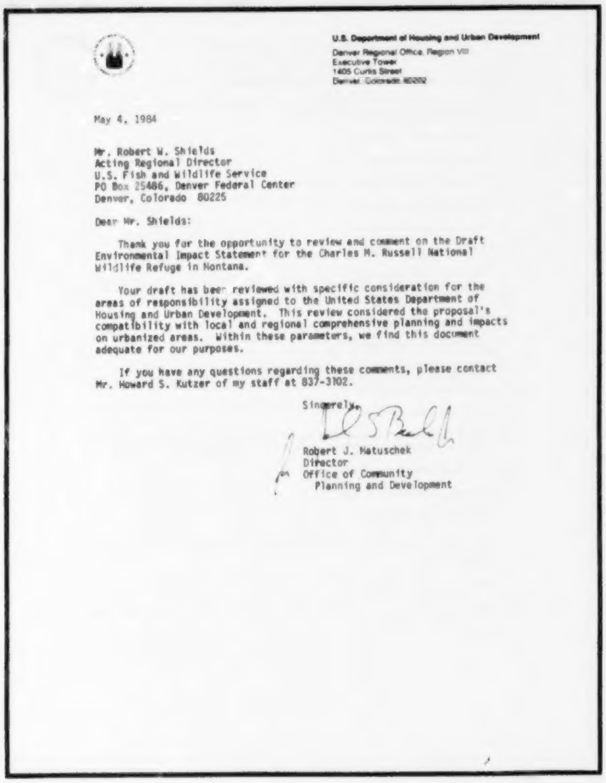
Even if some other management option were to be followed on the CMR we believe over-grazing and related water quality impacts should be corrected. This would be especially true for the Big Dry Arm area described in the draft EIS.

According to EPA's system for rating draft impact statements this EIS is rated LO-1 (lack of objections - sufficient information). If you have any questions, please contact Mr. Gene Taylor in this office at (406) 449-5486.

Sincerely,

John [illegible] Wardell, Director
Montana Office

cc: Dale Vodehnal, 8WM-SP



U.S. Department of Housing and Urban Development
Denver Regional Office, Region VIII
Executive Tower
1405 Curtis Street
Denver, Colorado 80202

May 4, 1984

Mr. Robert W. Shields
Acting Regional Director
U.S. Fish and Wildlife Service
PO Box 25486, Denver Federal Center
Denver, Colorado 80225

Dear Mr. Shields:

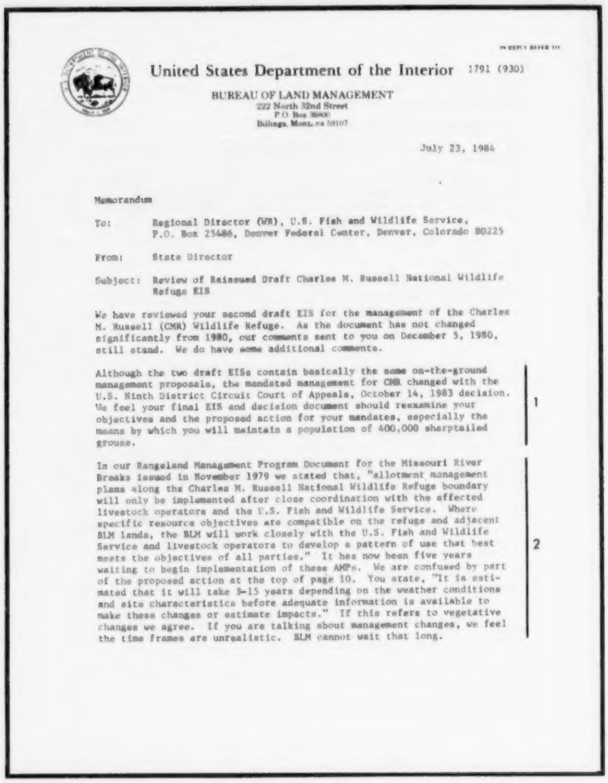
Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement for the Charles M. Russell National Wildlife Refuge in Montana.

Your draft has been reviewed with specific consideration for the areas of responsibility assigned to the United States Department of Housing and Urban Development. This review considered the proposal's compatibility with local and regional comprehensive planning and impacts on urbanized areas. Within these parameters, we find this document adequate for our purposes.

If you have any questions regarding these comments, please contact Mr. Howard S. Kutzer of my staff at 837-3102.

Sincerely,

Robert J. Matuschek
Director
Office of Community
Planning and Development



IN REPLY REFER TO:

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
222 North 32nd Street
P.O. Box 36800
Billings, Montana 59107

1791 (930)

July 23, 1984

Memorandum

To: Regional Director (WR), U.S. Fish and Wildlife Service, P.O. Box 25486, Denver Federal Center, Denver, Colorado 80225

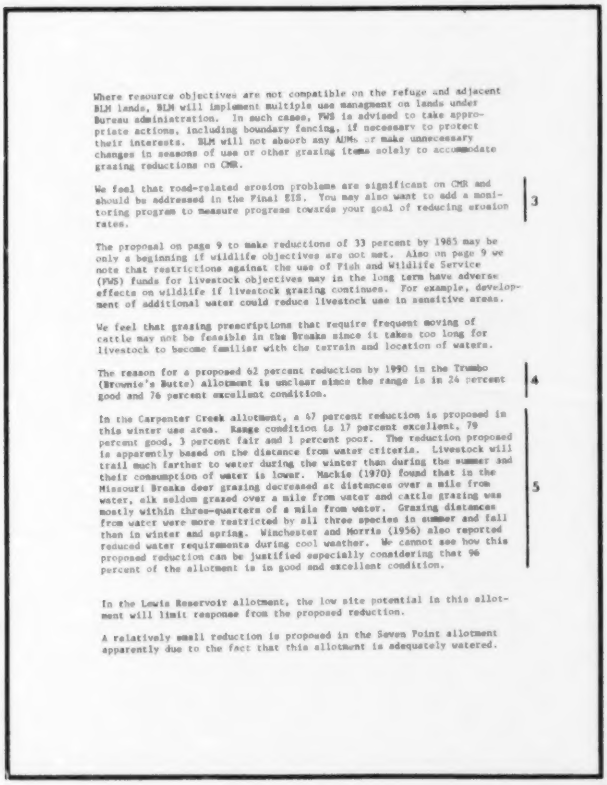
From: State Director

Subject: Review of Reissued Draft Charles M. Russell National Wildlife Refuge EIS

We have reviewed your second draft EIS for the management of the Charles M. Russell (CMR) Wildlife Refuge. As the document has not changed significantly from 1980, our comments sent to you on December 5, 1980, still stand. We do have some additional comments.

Although the two draft EISs contain basically the same on-the-ground management proposals, the mandated management for CMR changed with the U.S. Ninth District Circuit Court of Appeals, October 14, 1983 decision. We feel your final EIS and decision document should reexamine your objectives and the proposed action for your mandates, especially the means by which you will maintain a population of 400,000 sharptailed grouse. 1

In our Rangeland Management Program Document for the Missouri River Breaks issued in November 1979 we stated that, "allotment management plans along the Charles M. Russell National Wildlife Refuge boundary will only be implemented after close coordination with the affected livestock operators and the U.S. Fish and Wildlife Service. Where specific resource objectives are compatible on the refuge and adjacent BLM lands, the BLM will work closely with the U.S. Fish and Wildlife Service and livestock operators to develop a pattern of use that best meets the objectives of all parties." It has now been five years waiting to begin implementation of these AMPs. We are confused by part of the proposed action at the top of page 10. You state, "It is estimated that it will take 9-15 years depending on the weather conditions and site characteristics before adequate information is available to make these changes or estimate impacts." If this refers to vegetative changes we agree. If you are talking about management changes, we feel the time frames are unrealistic. BLM cannot wait that long. 2



Where resource objectives are not compatible on the refuge and adjacent BLM lands, BLM will implement multiple use managment on lands under Bureau administration. In such cases, FWS is advised to take appropriate actions, including boundary fencing, if necessary to protect their interests. BLM will not absorb any AUMs or make unnecessary changes in seasons of use or other grazing items solely to accommodate grazing reductions on CMR.

We feel that road-related erosion problems are significant on CMR and should be addressed in the Final EIS. You may also want to add a monitoring program to measure progress towards your goal of reducing erosion rates. 3

The proposal on page 9 to make reductions of 33 percent by 1985 may be only a beginning if wildlife objectives are not met. Also on page 9 we note that restrictions against the use of Fish and Wildlife Service (FWS) funds for livestock objectives may in the long term have adverse effects on wildlife if livestock grazing continues. For example, development of additional water could reduce livestock use in sensitive areas.

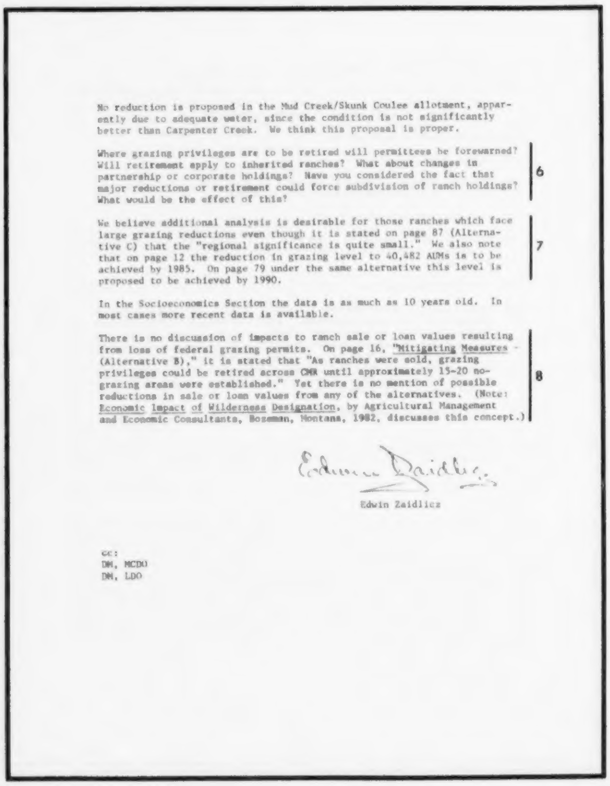
We feel that grazing prescriptions that require frequent moving of cattle may not be feasible in the Breaks since it takes too long for livestock to become familiar with the terrain and location of waters.

The reason for a proposed 62 percent reduction by 1990 in the Trumbo (Brownie's Butte) allotment is unclear since the range is in 24 percent good and 76 percent excellent condition. 4

In the Carpenter Creek allotment, a 47 percent reduction is proposed in this winter use area. Range condition is 17 percent excellent, 79 percent good, 3 percent fair and 1 percent poor. The reduction proposed is apparently based on the distance from water criteria. Livestock will trail much farther to water during the winter than during the summer and their consumption of water is lower. Mackie (1970) found that in the Missouri Breaks deer grazing decreased at distances over a mile from water, elk seldom grazed over a mile from water and cattle grazing was mostly within three-quarters of a mile from water. Grazing distances from water were more restricted by all three species in summer and fall than in winter and spring. Winchester and Morris (1956) also reported reduced water requirements during cool weather. We cannot see how this proposed reduction can be justified especially considering that 96 percent of the allotment is in good and excellent condition. 5

In the Lewis Reservoir allotment, the low site potential in this allotment will limit response from the proposed reduction.

A relatively small reduction is proposed in the Seven Point allotment apparently due to the fact that this allotment is adequately watered.



No reduction is proposed in the Mud Creek/Skunk Coulee allotment, apparently due to adequate water, since the condition is not significantly better than Carpenter Creek. We think this proposal is proper.

Where grazing privileges are to be retired will permittees be forewarned? Will retirement apply to inherited ranches? What about changes in partnership or corporate holdings? Have you considered the fact that major reductions or retirement could force subdivision of ranch holdings? What would be the effect of this? 6

We believe additional analysis is desirable for those ranches which face large grazing reductions even though it is stated on page 87 (Alternative C) that the "regional significance is quite small." We also note that on page 12 the reduction in grazing level to 40,482 AUMs is to be achieved by 1985. On page 79 under the same alternative this level is proposed to be achieved by 1990. 7

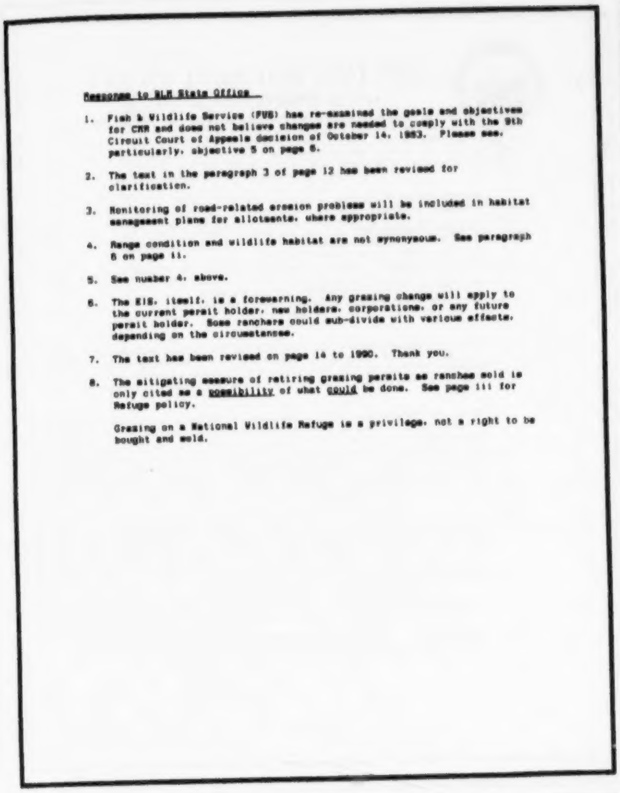
In the Socioeconomics Section the data is as much as 10 years old. In most cases more recent data is available.

There is no discussion of impacts to ranch sale or loan values resulting from loss of federal grazing permits. On page 16, "Mitigating Measures - (Alternative B)," it is stated that "As ranches were sold, grazing privileges could be retired across CMR until approximately 15-20 no-grazing areas were established." Yet there is no mention of possible reductions in sale or loan values from any of the alternatives. (Note: Economic Impact of Wilderness Designation, by Agricultural Management and Economic Consultants, Bozeman, Montana, 1982, discusses this concept.) 8

Edwin Zaidlicz

Edwin Zaidlicz

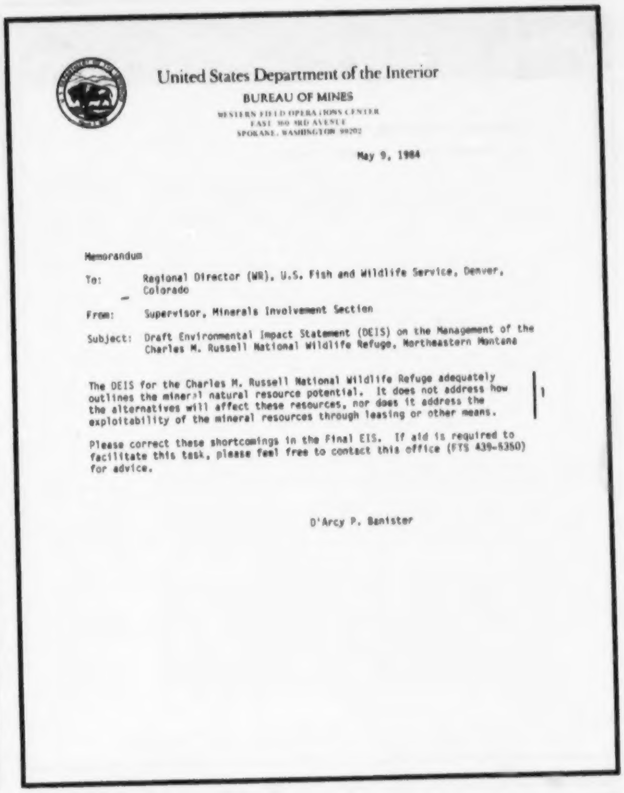
cc:
DM, MCDO
DM, LDO



Response to BLM State Office

1. Fish & Wildlife Service (FWS) has re-examined the goals and objectives for CMR and does not believe changes are needed to comply with the 9th Circuit Court of Appeals decision of October 14, 1983. Please see, particularly, objective 5 on page 6.
2. The text in the paragraph 3 of page 12 has been revised for clarification.
3. Monitoring of road-related erosion problems will be included in habitat management plans for allotments, where appropriate.
4. Range condition and wildlife habitat are not synonymous. See paragraph 6 on page ii.
5. See number 4, above.
6. The EIS, itself, is a forewarning. Any grazing change will apply to the current permit holder, new holders, corporations, or any future permit holder. Some ranchers could sub-divide with various effects, depending on the circumstances.
7. The text has been revised on page 14 to 1990. Thank you.
8. The mitigating measure of retiring grazing permits as ranches sold is only cited as a possibility of what could be done. See page iii for Refuge policy.

   Grazing on a National Wildlife Refuge is a privilege, not a right to be bought and sold.



United States Department of the Interior
BUREAU OF MINES
WESTERN FIELD OPERATIONS CENTER
EAST 360 3RD AVENUE
SPOKANE, WASHINGTON 99202

May 9, 1984

Memorandum

To: Regional Director (WR), U.S. Fish and Wildlife Service, Denver, Colorado

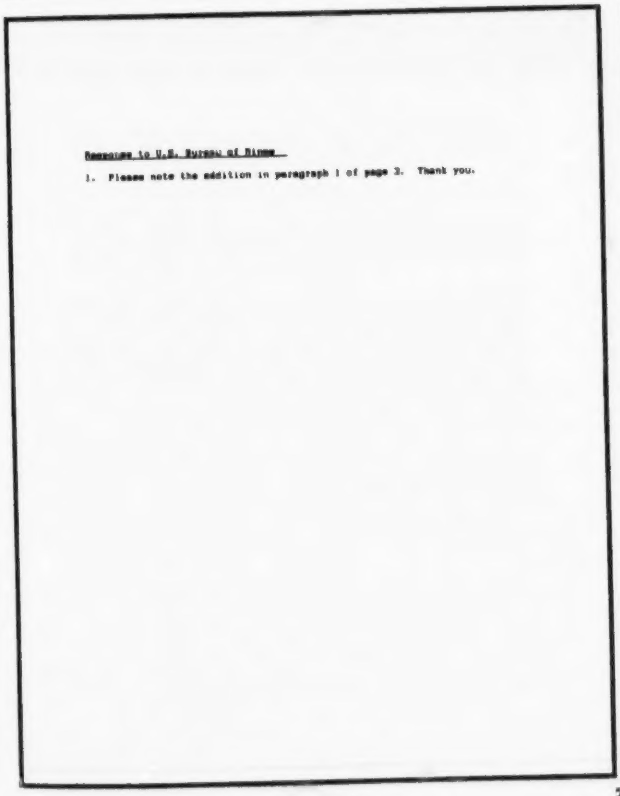
From: Supervisor, Minerals Involvement Section

Subject: Draft Environmental Impact Statement (DEIS) on the Management of the Charles M. Russell National Wildlife Refuge, Northeastern Montana

The DEIS for the Charles M. Russell National Wildlife Refuge adequately outlines the mineral natural resource potential. It does not address how the alternatives will affect these resources, nor does it address the exploitability of the mineral resources through leasing or other means. 1

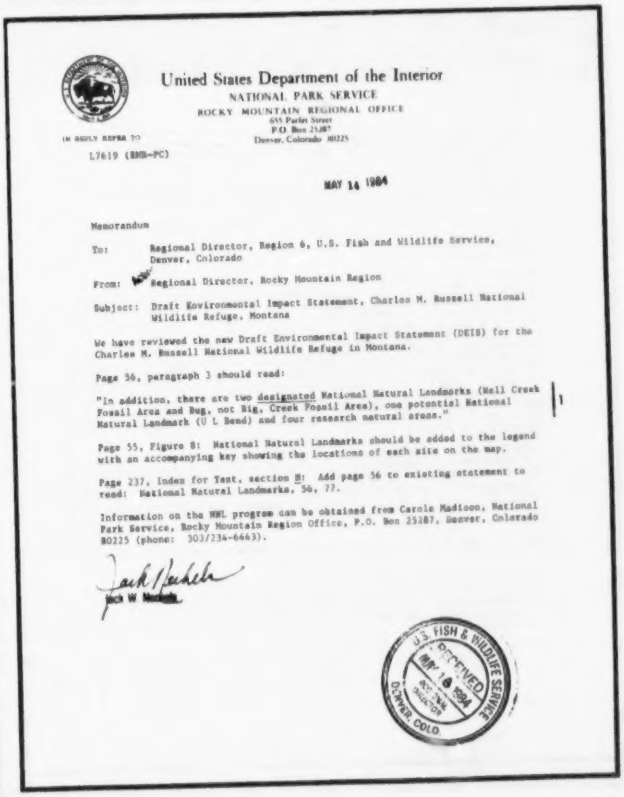
Please correct these shortcomings in the Final EIS. If aid is required to facilitate this task, please feel free to contact this office (FTS 439-5350) for advice.

D'Arcy P. Banister



Response to U.S. Bureau of Mines

1. Please note the addition in paragraph 1 of page 3. Thank you.



United States Department of the Interior
NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE
655 Parfet Street
P.O. Box 25287
Denver, Colorado 80225

IN REPLY REFER TO
L7619 (RMR-PC)

MAY 14 1984

Memorandum

To: Regional Director, Region 6, U.S. Fish and Wildlife Service, Denver, Colorado

From: Regional Director, Rocky Mountain Region

Subject: Draft Environmental Impact Statement, Charles M. Russell National Wildlife Refuge, Montana

We have reviewed the new Draft Environmental Impact Statement (DEIS) for the Charles M. Russell National Wildlife Refuge in Montana.

Page 56, paragraph 3 should read:

"In addition, there are two designated National Natural Landmarks (Hell Creek Fossil Area and Bug, not Big, Creek Fossil Area), one potential National Natural Landmark (U L Bend) and four research natural areas." 1

Page 55, Figure 8: National Natural Landmarks should be added to the legend with an accompanying key showing the locations of each site on the map.

Page 237, Index for Text, section N: Add page 56 to existing statement to read: National Natural Landmarks, 56, 77.

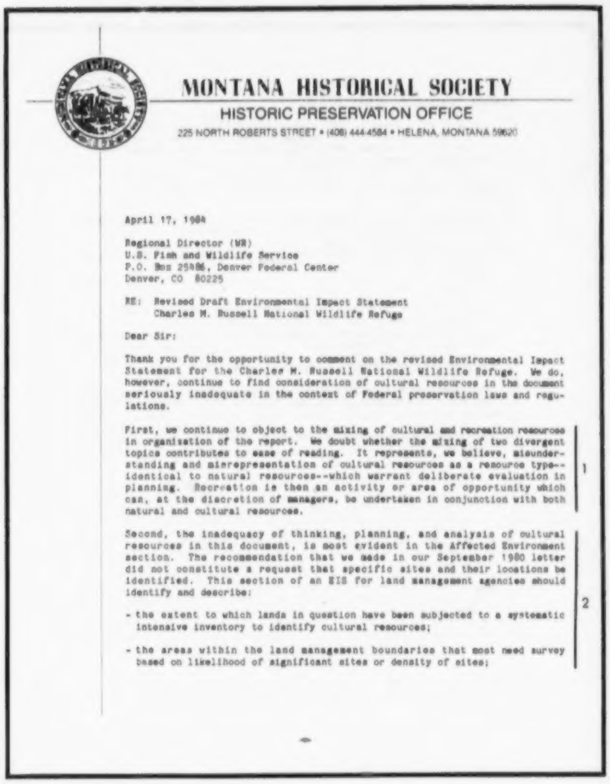
Information on the NNL program can be obtained from Carole Madison, National Park Service, Rocky Mountain Region Office, P.O. Box 25287, Denver, Colorado 80225 (phone: 303/234-6663).

Jack Neckels
Jack W. Neckels

U.S. FISH & WILDLIFE SERVICE
RECEIVED
MAY 18 1984
DENVER, COLO

Response to the National Park Service

1. The text has been corrected. Thank you.



MONTANA HISTORICAL SOCIETY
HISTORIC PRESERVATION OFFICE
225 NORTH ROBERTS STREET • (406) 444-4584 • HELENA, MONTANA 59620

April 17, 1984

Regional Director (WR)
U.S. Fish and Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, CO 80225

RE: Revised Draft Environmental Impact Statement
Charles M. Russell National Wildlife Refuge

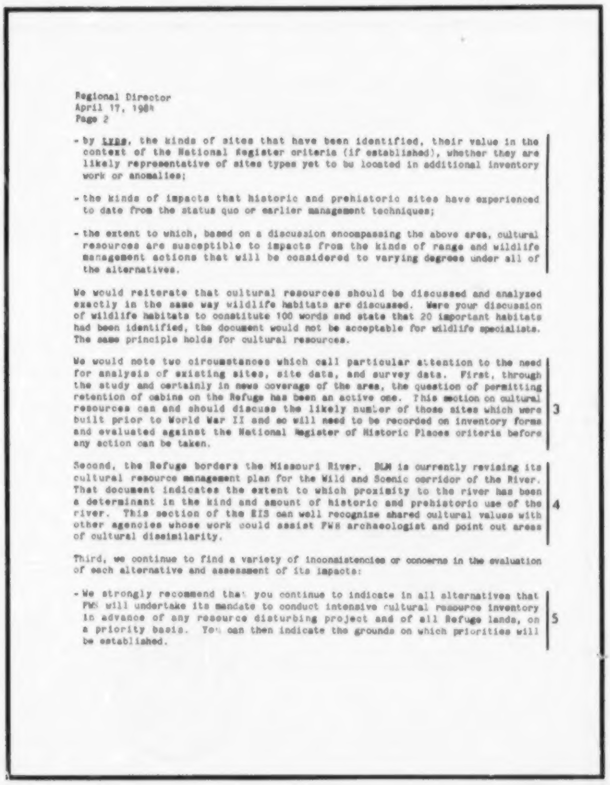
Dear Sir:

Thank you for the opportunity to comment on the revised Environmental Impact Statement for the Charles M. Russell National Wildlife Refuge. We do, however, continue to find consideration of cultural resources in the document seriously inadequate in the context of Federal preservation laws and regulations.

First, we continue to object to the mixing of cultural and recreation resources in organization of the report. We doubt whether the mixing of two divergent topics contributes to ease of reading. It represents, we believe, misunderstanding and misrepresentation of cultural resources as a resource type--identical to natural resources--which warrant deliberate evaluation in planning. Recreation is then an activity or area of opportunity which can, at the discretion of managers, be undertaken in conjunction with both natural and cultural resources. 1

Second, the inadequacy of thinking, planning, and analysis of cultural resources in this document, is most evident in the Affected Environment section. The recommendation that we made in our September 1980 letter did not constitute a request that specific sites and their locations be identified. This section of an EIS for land management agencies should identify and describe: 2

- the extent to which lands in question have been subjected to a systematic intensive inventory to identify cultural resources;
- the areas within the land management boundaries that most need survey based on likelihood of significant sites or density of sites;



Regional Director
April 17, 1984
Page 2

- by type, the kinds of sites that have been identified, their value in the context of the National Register criteria (if established), whether they are likely representative of sites types yet to be located in additional inventory work or anomalies;
- the kinds of impacts that historic and prehistoric sites have experienced to date from the status quo or earlier management techniques;
- the extent to which, based on a discussion encompassing the above area, cultural resources are susceptible to impacts from the kinds of range and wildlife management actions that will be considered to varying degrees under all of the alternatives.

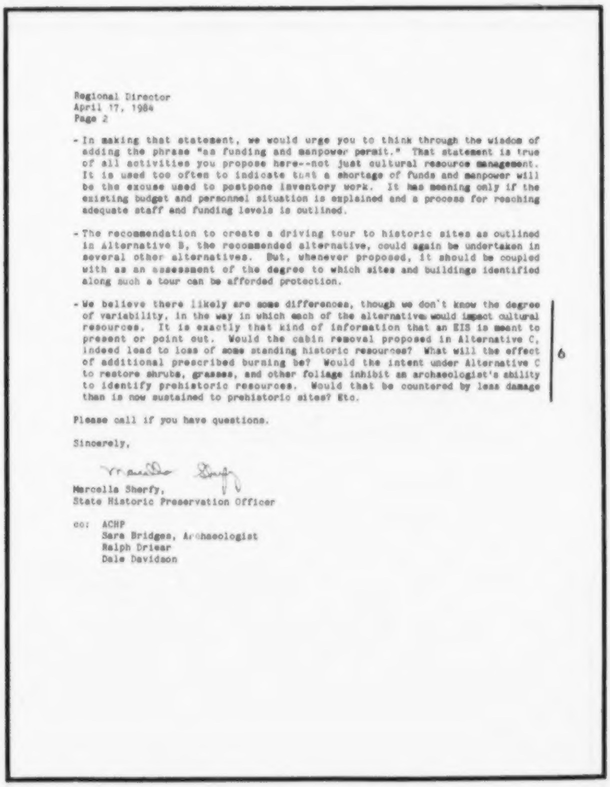
We would reiterate that cultural resources should be discussed and analyzed exactly in the same way wildlife habitats are discussed. Were your discussion of wildlife habitats to constitute 100 words and state that 20 important habitats had been identified, the document would not be acceptable for wildlife specialists. The same principle holds for cultural resources.

We would note two circumstances which call particular attention to the need for analysis of existing sites, site data, and survey data. First, through the study and certainly in news coverage of the area, the question of permitting retention of cabins on the Refuge has been an active one. This section on cultural resources can and should discuss the likely number of those sites which were built prior to World War II and so will need to be recorded on inventory forms and evaluated against the National Register of Historic Places criteria before any action can be taken. 3

Second, the Refuge borders the Missouri River. BLM is currently revising its cultural resource management plan for the Wild and Scenic corridor of the River. That document indicates the extent to which proximity to the river has been a determinant in the kind and amount of historic and prehistoric use of the river. This section of the EIS can well recognize shared cultural values with other agencies whose work could assist FWS archaeologist and point out areas of cultural dissimilarity. 4

Third, we continue to find a variety of inconsistencies or concerns in the evaluation of each alternative and assessment of its impacts:

- We strongly recommend that you continue to indicate in all alternatives that FWS will undertake its mandate to conduct intensive cultural resource inventory in advance of any resource disturbing project and of all Refuge lands, on a priority basis. You can then indicate the grounds on which priorities will be established. 5



Regional Director
April 17, 1984
Page 2

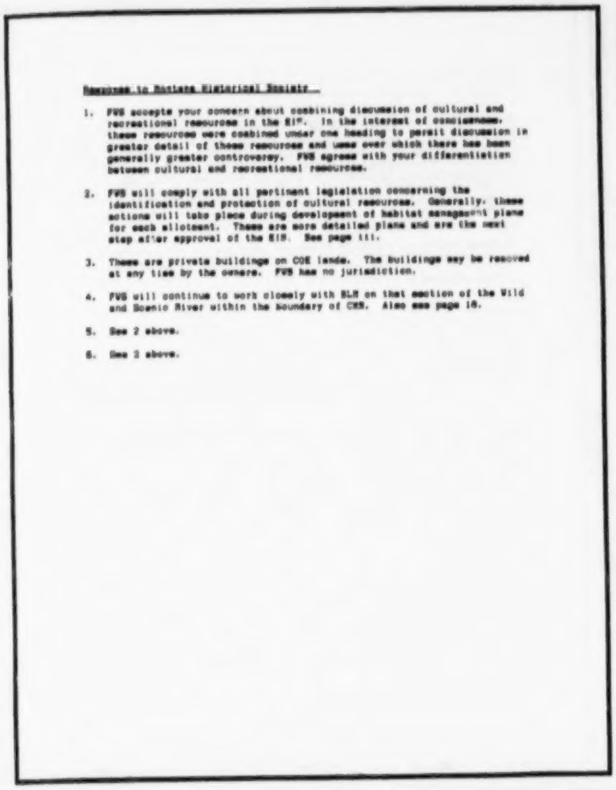
- In making that statement, we would urge you to think through the wisdom of adding the phrase "as funding and manpower permit." That statement is true of all activities you propose here--not just cultural resource management. It is used too often to indicate that a shortage of funds and manpower will be the excuse used to postpone inventory work. It has meaning only if the existing budget and personnel situation is explained and a process for reaching adequate staff and funding levels is outlined.
- The recommendation to create a driving tour to historic sites as outlined in Alternative B, the recommended alternative, could again be undertaken in several other alternatives. But, whenever proposed, it should be coupled with as an assessment of the degree to which sites and buildings identified along such a tour can be afforded protection.
- We believe there likely are some differences, though we don't know the degree of variability, in the way in which each of the alternatives would impact cultural resources. It is exactly that kind of information that an EIS is meant to present or point out. Would the cabin removal proposed in Alternative C, indeed lead to loss of some standing historic resources? What will the effect of additional prescribed burning be? Would the intent under Alternative C to restore shrubs, grasses, and other foliage inhibit an archaeologist's ability to identify prehistoric resources. Would that be countered by less damage than is now sustained to prehistoric sites? Etc. 6

Please call if you have questions.

Sincerely,

Marcella Sherfy,
State Historic Preservation Officer

cc: ACHP
Sara Bridges, Archaeologist
Ralph Driear
Dale Davidson



Response to Montana Historical Society

1. FWS accepts your concern about combining discussion of cultural and recreational resources in the EIS. In the interest of conciseness, these resources were combined under one heading to permit discussion in greater detail of those resources and uses over which there has been generally greater controversy. FWS agrees with your differentiation between cultural and recreational resources.

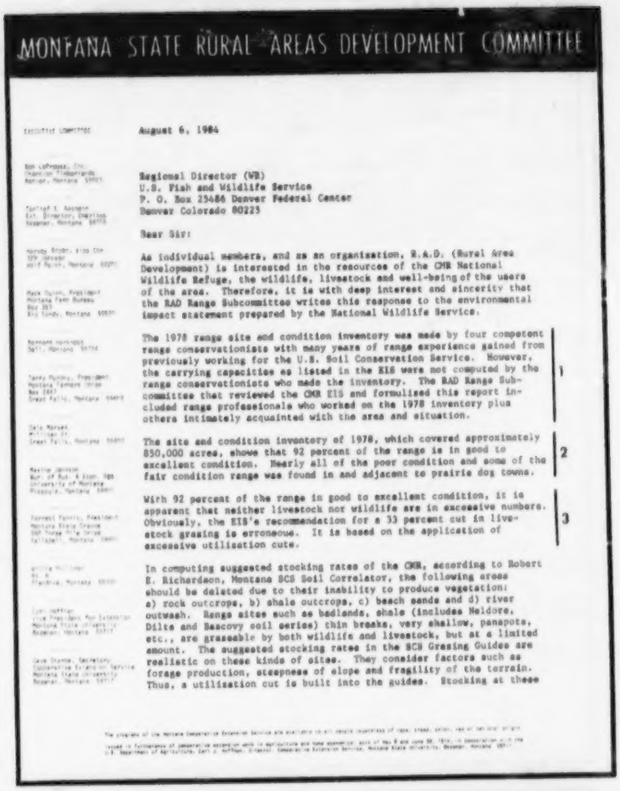
2. FWS will comply with all pertinent legislation concerning the identification and protection of cultural resources. Generally, these actions will take place during development of habitat management plans for each allotment. These are more detailed plans and are the next step after approval of the EIS. See page iii.

3. These are private buildings on COE lands. The buildings may be removed at any time by the owners. FWS has no jurisdiction.

4. FWS will continue to work closely with BLM on that section of the Wild and Scenic River within the boundary of CMR. Also see page 18.

5. See 2 above.

6. See 2 above.



MONTANA STATE RURAL AREAS DEVELOPMENT COMMITTEE

August 6, 1984

Regional Director (WB)
U.S. Fish and Wildlife Service
P. O. Box 25486 Denver Federal Center
Denver Colorado 80225

Dear Sir:

As individual members, and as an organization, R.A.D. (Rural Area Development) is interested in the resources of the CMR National Wildlife Refuge, the wildlife, livestock and well-being of the users of the area. Therefore, it is with deep interest and sincerity that the RAD Range Subcommittee writes this response to the environmental impact statement prepared by the National Wildlife Service.

The 1978 range site and condition inventory was made by four competent range conservationists with many years of range experience gained from previously working for the U.S. Soil Conservation Service. However, the carrying capacities as listed in the EIS were not computed by the range conservationists who made the inventory. The RAD Range Subcommittee that reviewed the CMR EIS and formulized this report included range professionals who worked on the 1978 inventory plus others intimately acquainted with the area and situation. 1

The site and condition inventory of 1978, which covered approximately 850,000 acres, shows that 92 percent of the range is in good to excellent condition. Nearly all of the poor condition and some of the fair condition range was found in and adjacent to prairie dog towns. 2

With 92 percent of the range in good to excellent condition, it is apparent that neither livestock nor wildlife are in excessive numbers. Obviously, the EIS's recommendation for a 33 percent cut in livestock grazing is erroneous. It is based on the application of excessive utilization cuts. 3

In computing suggested stocking rates of the CMR, according to Robert E. Richardson, Montana SCS Soil Correlator, the following areas should be deleted due to their inability to produce vegetation: a) rock outcrops, b) shale outcrops, c) beach sands and d) river outwash. Range sites such as badlands, shale (includes Neldore, Dilts and Bascovy soil series) thin breaks, very shallow, panspots, etc., are grazeable by both wildlife and livestock, but at a limited amount. The suggested stocking rates in the SCS Grazing Guides are realistic on these kinds of sites. They consider factors such as forage production, steepness of slope and fragility of the terrain. Thus, a utilization cut is built into the guides. Stocking at these

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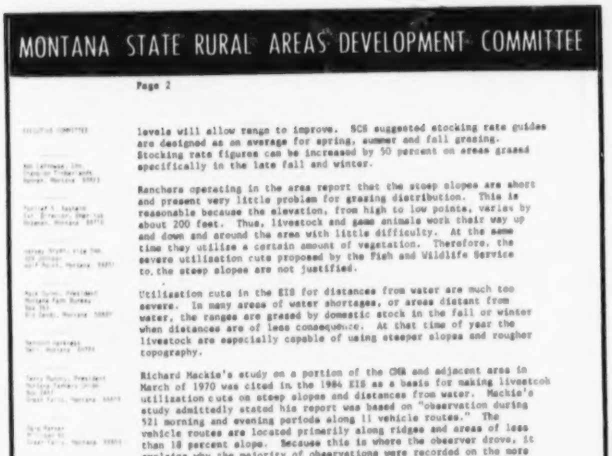


MONTANA STATE RURAL AREAS DEVELOPMENT COMMITTEE

Page 2

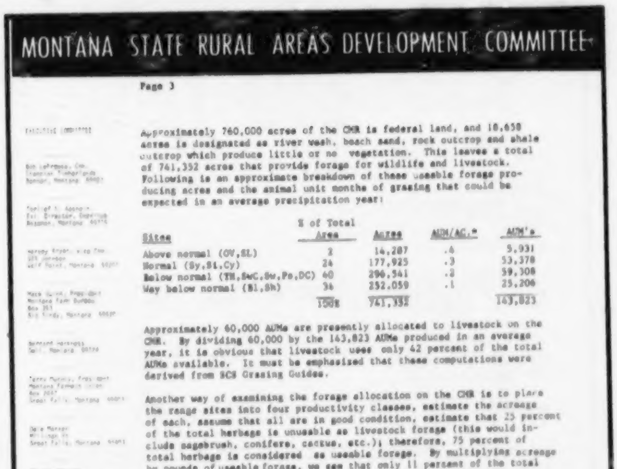
levels will allow range to improve. SCS suggested stocking rate guides are designed as an average for spring, summer and fall grazing. Stocking rate figures can be increased by 50 percent on areas grazed specifically in the late fall and winter.

Ranchers operating in the area report that the steep slopes are short and present very little problem for grazing distribution. This is reasonable because the elevation, from high to low points, varies by about 200 feet. Thus, livestock and game animals work their way up and down and around the area with little difficulty. At the same time they utilize a certain amount of vegetation. Therefore, the severe utilization cuts proposed by the Fish and Wildlife Service to the steep slopes are not justified.

Utilization cuts in the EIS for distances from water are much too severe. In many areas of water shortages, or areas distant from water, the ranges are grazed by domestic stock in the fall or winter when distances are of less consequence. At that time of year the livestock are especially capable of using steeper slopes and rougher topography.

Richard Mackie's study on a portion of the CMR and adjacent area in March of 1970 was cited in the 1984 EIS as a basis for making livestock utilization cuts on steep slopes and distances from water. Mackie's study admittedly stated his report was based on "observation during 521 morning and evening periods along 11 vehicle routes." The vehicle routes are located primarily along ridges and areas of less than 18 percent slope. Because this is where the observer drove, it explains why the majority of observations were recorded on the more level terrain. Thus, saying that livestock spend 80 percent of their time grazing areas of less than 18 percent slope is illogical and not necessarily true. Knowles (1975) observed that, "all recognizable cattle appeared to be farily mobile" in his study area (Nichols Coulee Allotment in CMR). He also recorded 39 percent of the cattle observations in November on slopes steeper than 10 degrees. These findings are contradictory to Mackie's observations, and reaffirm our concern that the U.S. Fish and Wildlife personnel have placed far too much importance on Mackie's study.

The SCS National Rangeland Handbook states the following general "rule of thumb" as a guide for optimum spacing of water facilities on different terrain: rough terrain - ¼-½ mile terrain; rolling terrain - 3/8-3/4 mile; level terrain - 3/4-1 mile. Although these SCS estimates are very similar to the Forest Service (Skovlin, 1977) and suggest that no utilization cut is needed on rough terrain that is within ½ mile of water, the EIS proposes a 89 percent cut on all range that is ¼ to ½ mile from water and on a 11 to 25 percent slope. It appears that the EIS recommendation simply shows the USFW's lack of understanding of the grazing ungulate and/or their bias toward the livestock industry.



MONTANA STATE RURAL AREAS DEVELOPMENT COMMITTEE

Page 3

Approximately 760,000 acres of the CMR is federal land, and 18,658 acres is designated as river wash, beach sand, rock outcrop and shale outcrop which produce little or no vegetation. This leaves a total of 741,352 acres that provide forage for wildlife and livestock. Following is an approximate breakdown of these useable forage producing acres and the animal unit months of grazing that could be expected in an average precipitation year:

Sites	% of Total Area	Acres	AUM/AC.*	AUM's
Above normal (OV,SL)	2	14,287	.4	5,931
Normal (Sy,Si,Cy)	24	177,925	.3	53,378
Below normal (TH,SwC,Sw,Ps,DC)	40	296,541	.2	59,308
Way below normal (Bl,Sh)	34	252,059	.1	25,206
	100%	741,352		143,823

Approximately 60,000 AUMs are presently allocated to livestock on the CMR. By dividing 60,000 by the 143,823 AUMs produced in an average year, it is obvious that livestock uses only 42 percent of the total AUMs available. It must be emphasized that these computations were derived from SCS Grazing Guides.

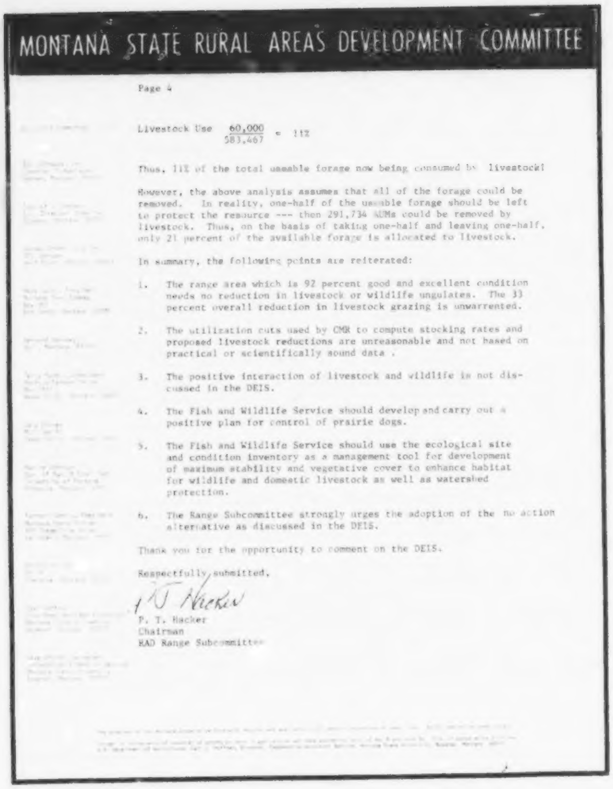
Another way of examining the forage allocation on the CMR is to place the range sites into four productivity classes, estimate the acreage of each, assume that all are in good condition, estimate that 25 percent of the total herbage is unuseable as livestock forage (this would include sagebrush, conifers, cactus, etc.); therefore, 75 percent of total herbage is considered as useable forage. By multiplying acreage by pounds of useable forage, we see that only 11 percent of the total useable forage is being consumed by livestock:

Federal Land - 760,000 Acres - 18,648 = 741,352 Acres.

Range Sites	% Of Productive Area	#Acres	Herbage Production Good	Forage Production
Above	2	14,827	2063	1547
Normal	24	177,925	1100	825
Below	40	296,541	713	535
Bottom	34	252,059	300	225
	100	741,352		

Site	Lbs. Useable Forage	# AUMs (+660)
Above	22,937,369	34,754
Normal	146,788,170	222,406
Below	158,649,430	240,378
Bottom	56,713,275	85,929
		583,467

Total AUMs of forage could be taken.



MONTANA STATE RURAL AREAS DEVELOPMENT COMMITTEE

Page 4

Livestock Use $\frac{60,000}{583,467} = 11\%$

Thus, 11% of the total usable forage now being consumed by livestock!

However, the above analysis assumes that all of the forage could be removed. In reality, one-half of the usable forage should be left to protect the resource --- then 291,734 AUMs could be removed by livestock. Thus, on the basis of taking one-half and leaving one-half, only 21 percent of the available forage is allocated to livestock.

In summary, the following points are reiterated:

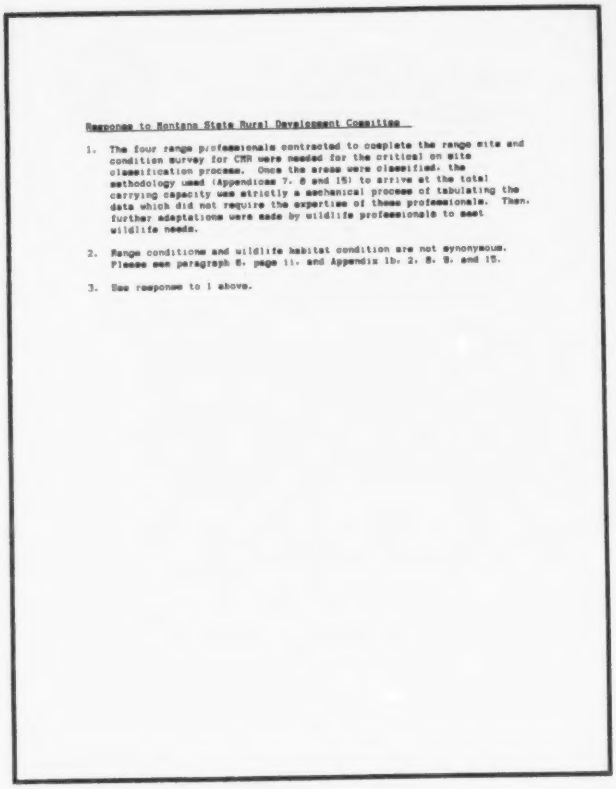
1. The range area which is 92 percent good and excellent condition needs no reduction in livestock or wildlife ungulates. The 33 percent overall reduction in livestock grazing is unwarrented.
2. The utilization cuts used by CMR to compute stocking rates and proposed livestock reductions are unreasonable and not based on practical or scientifically sound data .
3. The positive interaction of livestock and wildlife is not discussed in the DEIS.
4. The Fish and Wildlife Service should develop and carry out a positive plan for control of prairie dogs.
5. The Fish and Wildlife Service should use the ecological site and condition inventory as a management tool for development of maximum stability and vegetative cover to enhance habitat for wildlife and domestic livestock as well as watershed protection.
6. The Range Subcommittee strongly urges the adoption of the no action alternative as discussed in the DEIS.

Thank you for the opportunity to comment on the DEIS.

Respectfully submitted,

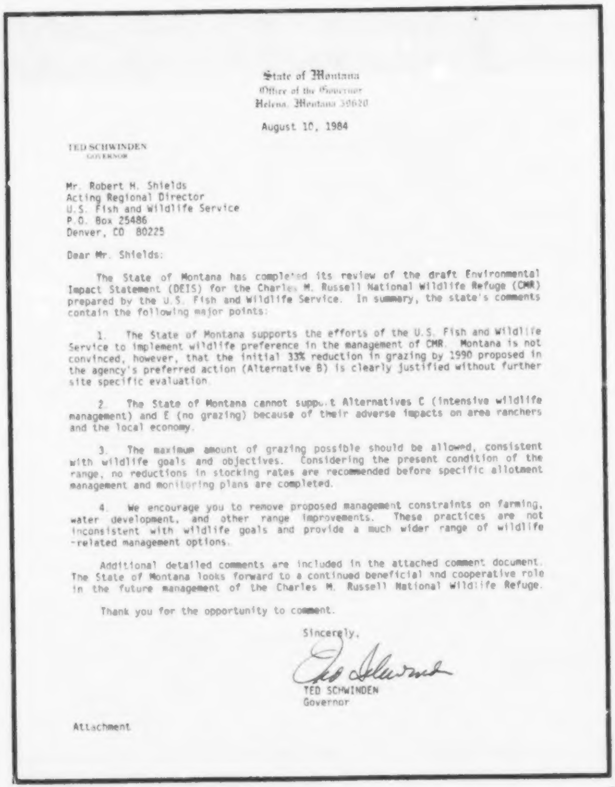
P T Hacker

P. T. Hacker
Chairman
RAD Range Subcommittee



Response to Montana State Rural Development Committee

1. The four range professionals contracted to complete the range site and condition survey for CMR were needed for the critical on site classification process. Once the areas were classified, the methodology used (Appendices 7, 8 and 15) to arrive at the total carrying capacity was strictly a mechanical process of tabulating the data which did not require the expertise of these professionals. Then, further adaptations were made by wildlife professionals to meet wildlife needs.
2. Range conditions and wildlife habitat condition are not synonymous. Please see paragraph 6, page 11, and Appendix 1b, 2, 8, 9, and 15.
3. See response to 1 above.



State of Montana
Office of the Governor
Helena, Montana 59620

August 10, 1984

TED SCHWINDEN
GOVERNOR

Mr. Robert H. Shields
Acting Regional Director
U.S. Fish and Wildlife Service
P.O. Box 25486
Denver, CO 80225

Dear Mr. Shields:

The State of Montana has completed its review of the draft Environmental Impact Statement (DEIS) for the Charles M. Russell National Wildlife Refuge (CMR) prepared by the U.S. Fish and Wildlife Service. In summary, the state's comments contain the following major points:

1. The State of Montana supports the efforts of the U.S. Fish and Wildlife Service to implement wildlife preference in the management of CMR. Montana is not convinced, however, that the initial 33% reduction in grazing by 1990 proposed in the agency's preferred action (Alternative B) is clearly justified without further site specific evaluation.

2. The State of Montana cannot support Alternatives C (intensive wildlife management) and E (no grazing) because of their adverse impacts on area ranchers and the local economy.

3. The maximum amount of grazing possible should be allowed, consistent with wildlife goals and objectives. Considering the present condition of the range, no reductions in stocking rates are recommended before specific allotment management and monitoring plans are completed.

4. We encourage you to remove proposed management constraints on farming, water development, and other range improvements. These practices are not inconsistent with wildlife goals and provide a much wider range of wildlife-related management options.

Additional detailed comments are included in the attached comment document. The State of Montana looks forward to a continued beneficial and cooperative role in the future management of the Charles M. Russell National Wildlife Refuge.

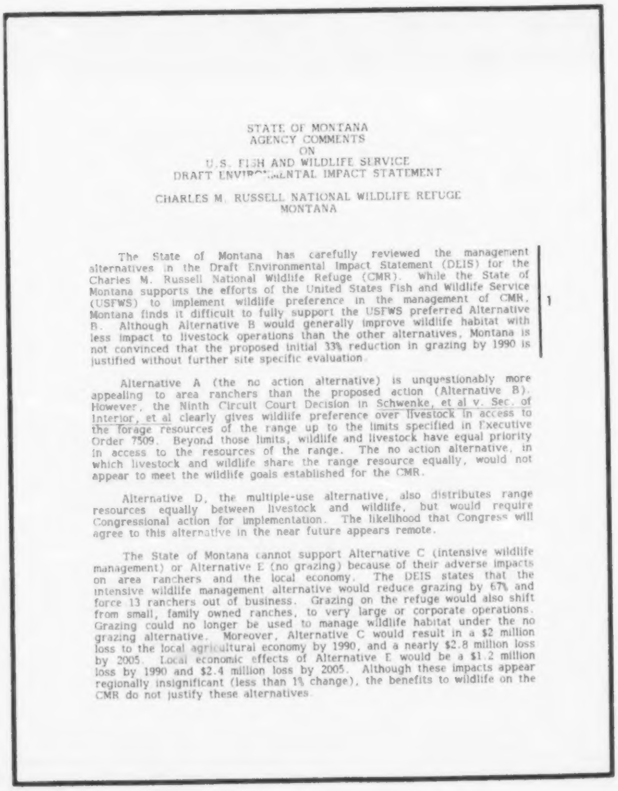
Thank you for the opportunity to comment.

Sincerely,

Ted Schwinden

TED SCHWINDEN
Governor

Attachment



STATE OF MONTANA
AGENCY COMMENTS
ON
U.S. FISH AND WILDLIFE SERVICE
DRAFT ENVIRONMENTAL IMPACT STATEMENT

CHARLES M. RUSSELL NATIONAL WILDLIFE REFUGE
MONTANA

The State of Montana has carefully reviewed the management alternatives in the Draft Environmental Impact Statement (DEIS) for the Charles M. Russell National Wildlife Refuge (CMR). While the State of Montana supports the efforts of the United States Fish and Wildlife Service (USFWS) to implement wildlife preference in the management of CMR, Montana finds it difficult to fully support the USFWS preferred Alternative B. Although Alternative B would generally improve wildlife habitat with less impact to livestock operations than the other alternatives, Montana is not convinced that the proposed initial 33% reduction in grazing by 1990 is justified without further site specific evaluation. 1

Alternative A (the no action alternative) is unquestionably more appealing to area ranchers than the proposed action (Alternative B). However, the Ninth Circuit Court Decision in Schwenke, et al v. Sec. of Interior, et al clearly gives wildlife preference over livestock in access to the forage resources of the range up to the limits specified in Executive Order 7509. Beyond those limits, wildlife and livestock have equal priority in access to the resources of the range. The no action alternative, in which livestock and wildlife share the range resource equally, would not appear to meet the wildlife goals established for the CMR.

Alternative D, the multiple-use alternative, also distributes range resources equally between livestock and wildlife, but would require Congressional action for implementation. The likelihood that Congress will agree to this alternative in the near future appears remote.

The State of Montana cannot support Alternative C (intensive wildlife management) or Alternative E (no grazing) because of their adverse impacts on area ranchers and the local economy. The DEIS states that the intensive wildlife management alternative would reduce grazing by 67% and force 13 ranchers out of business. Grazing on the refuge would also shift from small, family owned ranches, to very large or corporate operations. Grazing could no longer be used to manage wildlife habitat under the no grazing alternative. Moreover, Alternative C would result in a $2 million loss to the local agricultural economy by 1990, and a nearly $2.8 million loss by 2005. Local economic effects of Alternative E would be a $1.2 million loss by 1990 and $2.4 million loss by 2005. Although these impacts appear regionally insignificant (less than 1% change), the benefits to wildlife on the CMR do not justify these alternatives.

One of the most important goals for the CMR should be soil conservation. The State of Montana supports efforts to reduce erosion by grazing management, prescribed burns, shrub establishment, exclosures, or similar measures that improve livestock distribution and increase plant and litter cover. Although ripping, subsoiling, or contour furrowing have increased livestock forage production on many areas with hardpans or dense clay soils, these practices might not be worthwhile for erosion control alone. These mechanical treatments may increase the erosion hazard during intense storms and may create a weed problem if the furrows are not revegetated quickly. The funds planned for use in these treatments could possibly be better used for other treatment methods, including water development to better distribute grazing pressure on the CMR. 2

The following comments relate to the preferred alternative (Alternative B):

While the preferred action proposes to enhance wildlife habitat, the proposed methods for habitat maintenance and improvement are unrealistic. The proposed 33% reduction in livestock numbers cannot be fully supported for the following reasons:

1. The majority of the CMR range (92%) is presently in good or excellent range condition. Although range condition and wildlife habitat condition are not necessarily synonomous, good-excellent ranges represent ecosystems which are in higher stages of successional development. High successional communities tend to be relatively stable in the face of fluctuating climatic patterns, are in equilibrium with their physical habitats, and are more diverse than early successional communities. If past grazing management has kept 92% of the range in good or excellent condition, a 33% reduction in livestock numbers seems unjustified.

2. Grazing by large herds of ungulates has been a major controlling factor in the evolutionary development of mixed prairie vegetation. The proposed management will result in large areas of ungrazed rangelands. Overrest of range does not promote healthy forage plants. Sharptailed grouse, which require standing vegetation for nesting cover, survived the presence of grazing bison before the advent of livestock. They can survive and prosper on the CMR under present stocking levels, if sound range management principles are applied. Livestock can be used as a tool to prevent vegetation stagnation on under-grazed areas, while cover for sharptails can be rotated in successive years to benefit both wildlife and the range ecosystem.

3. Livestock are a more cost-effective tool for range improvement than many more expensive mechanical methods. However, adequate stocking rates are a prerequisite to the use of livestock for this purpose. Continuous grazing by small numbers of cattle can still result in over grazing of specific areas and plants. The use of spot grazing for maintenance of wildlife cover is not healthy from an ecosystem standpoint. Individual plants and areas can become overgrazed, while adjacent areas and plants suffer from the lack of utilization. A better option would be to prevent long-term stagnation of the range by grazing and to maintain sharptail, etc., cover by rotating areas of standing vegetation. 3

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4. Considering the present condition of the range, no reductions in stocking rates are recommended before specific allotment management and monitoring plans are completed. These plans should identify specific areas of significant wildlife-livestock conflicts, and recommend the most ecologically sound solutions. USFWS plans to develop cooperative allotment management plans are supported and encouraged. 4

Developing diverse, high-quality, and abundant wildlife habitat is a very important goal. We encourage you to remove proposed management constraints on farming, water developments, and other range improvements. Contrary to statements in the DEIS, these practices are not inconsistent with wildlife goals and, in fact, provide a much wider range of management options. Farming on a sharecropping basis provides greater habitat diversity, and standing crops may be left for wildlife food and cover. As the DEIS points out, limited farming could benefit several wildlife species and attract deer and elk away from neighboring farms and ranches where they may cause damage. Hay might also be produced in the refuge to help mitigate reduced grazing. Ponds may be developed or improved to provide additional waterfowl habitat. Fences, stock water developments, or other range improvements may be installed to improve livestock distribution and reduce livestock conflicts with wildlife. A completely natural setting does not necessarily provide the best wildlife habitat. Several management options are and should remain available to manipulate and improve wildlife habitat without relying entirely on grazing reductions.

The maximum amount of grazing possible should be allowed, consistent with wildlife goals and objectives. This would require careful monitoring of range and habitat conditions and flexible grazing management systems. Properly implemented deferred-rotation or rest-rotation grazing systems may provide adequate habitat improvement with less drastic forage cuts. If reductions in grazing are necessary, those reductions should be spread over ten to twenty years to reduce the impacts on the ranchers using the refuge and, hence, upon the regional economy. Extending the time period for proposed reductions would foster cooperation between local residents and CMR officials. Once good to excellent range conditions are reached, a grazing system could be implemented and an increase in Animal Unit Months (AUM) allowed (up to present levels). Also, since the initial CMR Planning Team included only one Range Conservationist, the final management planning team should include Range Conservationists from other agencies, such as the Bureau of Land Management, Soil Conservation Service, or the Montana Department of State Lands.

The Montana Department of State Lands currently manages 33,918 acres of school-trust lands within the boundaries of the CMR. The State must, by law (77-6-101, MCA), assess the forage that is available to livestock and compute AUMs accordingly. Because of the proposed grazing reductions on the adjacent refuge lands, conflicts may arise between the significantly different management mandates of each agency. The Department's comments to the USFWS on the 1980 DEIS remain valid, especially the recommendation that the agencies develop a Memorandum of Understanding delineating livestock grazing policies for the trust lands, as the USFWS proceeds with habitat management plans. 5

An inventory of water resources originating on or flowing through the CMR should be developed. The flow rate and water quality of major springs would provide valuable information for future wildlife and livestock management plans. Major intermittent and perennial tributaries should be identified and, if possible, a runoff schedule developed. Water quality should also be analyzed on those streams. The inventory should not be limited to streams wholly within the refuge, as several large tributaries begin outside the boundary and flow through CMR to the Missouri River. 6

Under the preferred Alternative B, twenty to thirty bighorn sheep are proposed for future planting in the refuge. Since previous bighorn sheep planting efforts in the area have not proved entirely successful, we question the value of additional reestablishment efforts and recommend consultation with the Montana Department of Fish, Wildlife and Parks. Reintroduction of buffalo may be impractical because of problems and costs associated with containing them, and may be inconsistent with planned reduction in AUMs on certain allotments.

The following are specific comments related to various sections of the DEIS:

1. Page 4. The CMR Mission, as stated, is appropriate. This mission may be accomplished under present stocking rates, recognizing that livestock are a valuable tool for range and wildlife habitat improvement.

2. Page 5. The reintroduction of endangered species to the CMR is a worthy objective. However, first priority among wildlife objectives should be to maintain a healthy, diverse range ecosystem. This will benefit all wildlife species and might be attained using present stocking rates.

3. Page 5, Objective 4. What does the "30 spring breeding birds/sq. mile" mean - males on leks, nesting females? Would such a density have to be established before hunting would be allowed? 7

4. Page 5, Objective 7: A Similar question is asked related to deer densities.

5. Page 5, Objective 7: Where will stated 10 deer/sq. mile figure be realized - on their winter range, yearlong range, joint BLM-CMR range, BLM range, etc.?

6. Page 10. A 33% reduction in AUMs is certainly a "significant management action." However, such a reduction would constrain a very effective tool for habitat improvement.

We support deferment of pastures from early spring grazing, when necessary, to protect range plans and to alleviate forage competition between livestock and wildlife.

7. Page 11. The fact that lure cropping is necessary to decrease elk depredation indicates that cooperative farming and haying should be maintained. Crops and hay within the CMR may help control wildlife depredation on adjacent private lands. It is stated on page 17 that "minimal farming...could benefit some wildlife on CMR...." Placing a constraint on the use of minimal farming greatly reduces management options on the CMR and is inconsistent with the conclusion that it can benefit wildlife. 8

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8. Page 13. Grazing permits have not been suspended in the past during dry years, and the range is in 92% good-excellent condition. A 33% reduction in AUMs along with the threat of permit suspensions is not supportable. Good grazing management usually allows for grazing during dry years without significant stock reductions.

The fence specifications are adequate to minimize damage to wildlife. The use of solar-powered electric fence (2 strands of smooth wire) should be considered also. This type of fence is cheaper, as effective, and less of an obstacle to wildlife than barbed wire fence. It is also readily moved, providing a flexibile management tool for control of grazing. 9

9. Page 16. Fencing and destocking are not the only tools available for improving overgrazed riparian areas and areas near water sources. Intensive grazing management, such as the Savory Grazing Method, is proving very effective in preventing livestock from "camping" near water sources and over-grazing the vegetation. 10

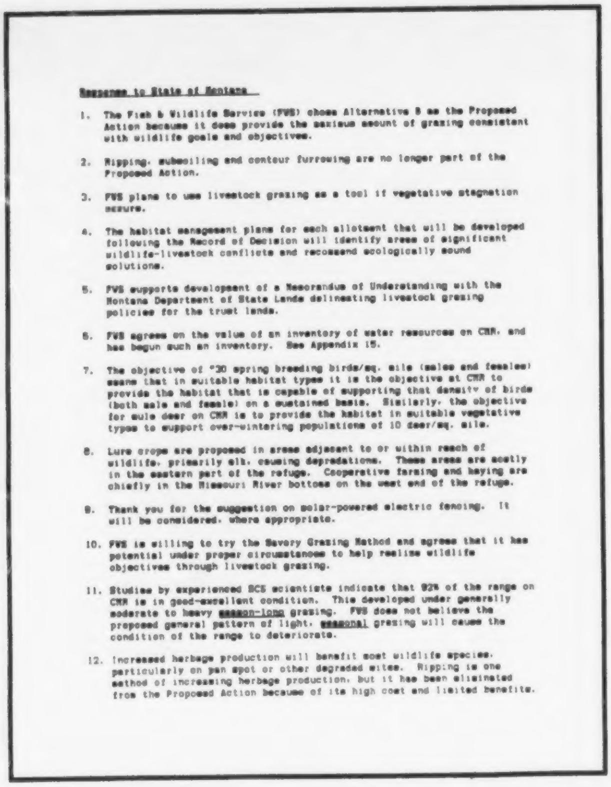
10. Page 26. It is stated that the No Grazing and Intensive Wildlife Management alternatives could result in private land closures to public use, which is already a problem in the area. The Preferred Alternative, which recommends a 33% reduction in AUMs, will also accelerate this problem. Hunters are a valuable wildlife management tool and economic asset to the area. The questionable benefits of the 33% AUM reduction should be carefully weighted against the increase in landowner/recreationist conflicts that may result from the Preferred Alternative.

11. Page 72. It is indicated that reduced stocking levels would improve range condition on fragile areas such as shale breaks, badlands, etc. It is difficult to believe that over-use is presently occurring on those areas considering the reluctance of cattle to utilize such areas under season-long grazing management and the fact that 92% of the range is in good-excellent condition. If specific problem areas exist, perhaps those conditions could perhaps be addressed in the individual allotment management plans.

The maintenance of long-term ecosystem stability on the CMR will not be enhanced by the grazing management proposed. Wildlife populations will benefit in the long run by maintaining healthy watersheds and range conditions. Livestock are a valuable tool for preventing stagnation of vegetation that evolved with large herds of bison. This type of grazing will not be simulated using small numbers of livestock under season-long management as proposed. 11

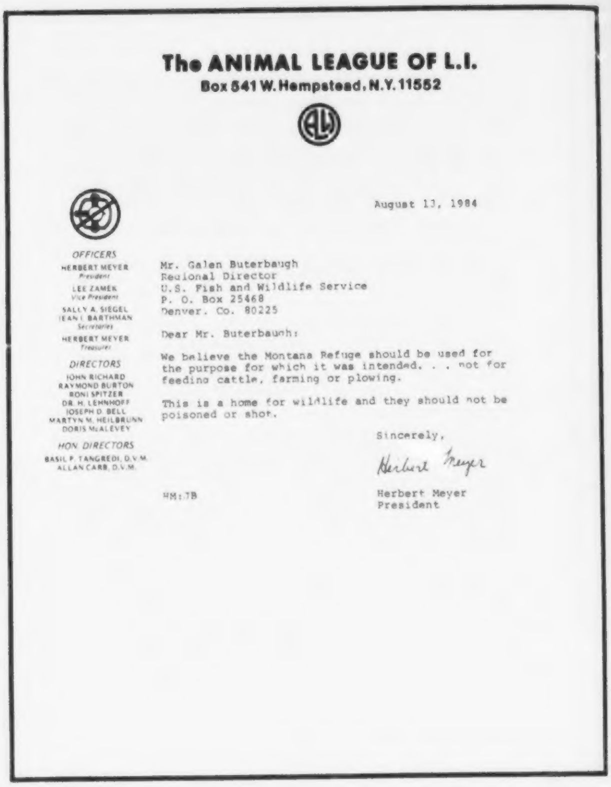
The Flood Control Act of 1944 assures the use of Fort Peck Reservoir water for irrigation development in Montana. Management proposed in the Final EIS should not foreclose the option to convey water across the CMR via pipeline or canal.

12. Page 85: With increased herbage production, does wildlife use also increase? Is herbage production the limiting factor for wildlife species you desire to benefit in areas scheduled for ripping? 12



Response to State of Montana

1. The Fish & Wildlife Service (FWS) chose Alternative B as the Proposed Action because it does provide the maximum amount of grazing consistent with wildlife goals and objectives.
2. Ripping, subsoiling and contour furrowing are no longer part of the Proposed Action.
3. FWS plans to use livestock grazing as a tool if vegetative stagnation occurs.
4. The habitat management plans for each allotment that will be developed following the Record of Decision will identify areas of significant wildlife-livestock conflicts and recommend ecologically sound solutions.
5. FWS supports development of a Memorandum of Understanding with the Montana Department of State Lands delineating livestock grazing policies for the trust lands.
6. FWS agrees on the value of an inventory of water resources on CMR, and has begun such an inventory. See Appendix 15.
7. The objective of "30 spring breeding birds/sq. mile (males and females) means that in suitable habitat types it is the objective at CMR to provide the habitat that is capable of supporting that density of birds (both male and female) on a sustained basis. Similarly, the objective for mule deer on CMR is to provide the habitat in suitable vegetative types to support over-wintering populations of 10 deer/sq. mile.
8. Lure crops are proposed in areas adjacent to or within reach of wildlife, primarily elk, causing depredations. These areas are mostly in the eastern part of the refuge. Cooperative farming and haying are chiefly in the Missouri River bottoms on the west end of the refuge.
9. Thank you for the suggestion on solar-powered electric fencing. It will be considered, where appropriate.
10. FWS is willing to try the Savory Grazing Method and agrees that it has potential under proper circumstances to help realize wildlife objectives through livestock grazing.
11. Studies by experienced SCS scientists indicate that 92% of the range on CMR is in good-excellent condition. This developed under generally moderate to heavy season-long grazing. FWS does not believe the proposed general pattern of light, seasonal grazing will cause the condition of the range to deteriorate.
12. Increased herbage production will benefit most wildlife species, particularly on pan spot or other degraded sites. Ripping is one method of increasing herbage production, but it has been eliminated from the Proposed Action because of its high cost and limited benefits.



The ANIMAL LEAGUE OF L.I.
Box 541 W. Hempstead, N.Y. 11552

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ALLAN CARB, D.V.M.

August 13, 1984

Mr. Galen Buterbaugh
Regional Director
U.S. Fish and Wildlife Service
P. O. Box 25468
Denver, Co. 80225

Dear Mr. Buterbaugh:

We believe the Montana Refuge should be used for the purpose for which it was intended. . . not for feeding cattle, farming or plowing.

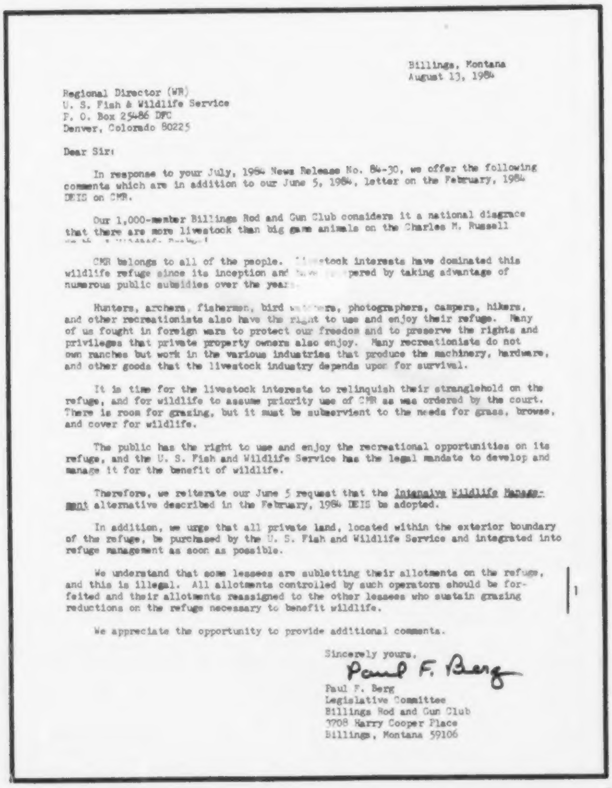
This is a home for wildlife and they should not be poisoned or shot.

Sincerely,

Herbert Meyer

Herbert Meyer
President

HM:JB



Billings, Montana
August 13, 1984

Regional Director (WR)
U. S. Fish & Wildlife Service
P. O. Box 25486 DFC
Denver, Colorado 80225

Dear Sir:

In response to your July, 1984 News Release No. 84-30, we offer the following comments which are in addition to our June 5, 1984, letter on the February, 1984 DEIS on CMR.

Our 1,000-member Billings Rod and Gun Club considers it a national disgrace that there are more livestock than big game animals on the Charles M. Russell [illegible]

CMR belongs to all of the people. Livestock interests have dominated this wildlife refuge since its inception and have prospered by taking advantage of numerous public subsidies over the years.

Hunters, archers, fishermen, bird watchers, photographers, campers, hikers, and other recreationists also have the right to use and enjoy their refuge. Many of us fought in foreign wars to protect our freedom and to preserve the rights and privileges that private property owners also enjoy. Many recreationists do not own ranches but work in the various industries that produce the machinery, hardware, and other goods that the livestock industry depends upon for survival.

It is time for the livestock interests to relinquish their stranglehold on the refuge, and for wildlife to assume priority use of CMR as was ordered by the court. There is room for grazing, but it must be subservient to the needs for grass, browse, and cover for wildlife.

The public has the right to use and enjoy the recreational opportunities on its refuge, and the U. S. Fish and Wildlife Service has the legal mandate to develop and manage it for the benefit of wildlife.

Therefore, we reiterate our June 5 request that the Intensive Wildlife Management alternative described in the February, 1984 DEIS be adopted.

In addition, we urge that all private land, located within the exterior boundary of the refuge, be purchased by the U. S. Fish and Wildlife Service and integrated into refuge management as soon as possible.

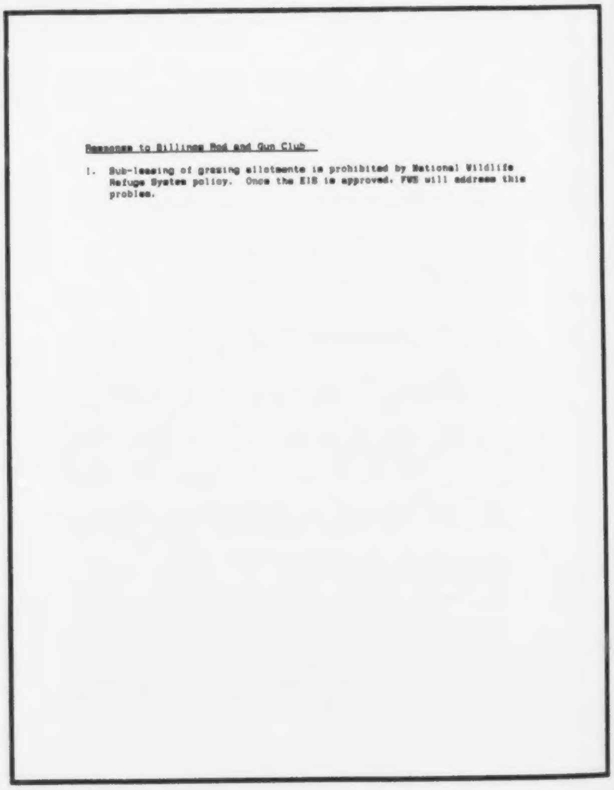
We understand that some lessees are subletting their allotments on the refuge, and this is illegal. All allotments controlled by such operators should be forfeited and their allotments reassigned to the other lessees who sustain grazing reductions on the refuge necessary to benefit wildlife. 1

We appreciate the opportunity to provide additional comments.

Sincerely yours,

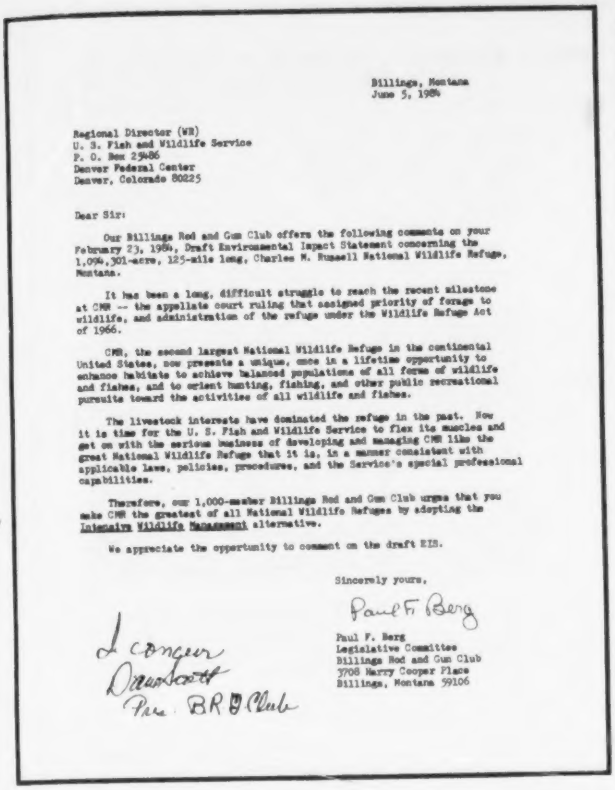
Paul F. Berg

Paul F. Berg
Legislative Committee
Billings Rod and Gun Club
3708 Harry Cooper Place
Billings, Montana 59106



Response to Billings Rod and Gun Club

1. Sub-leasing of grazing allotments is prohibited by National Wildlife Refuge System policy. Once the EIS is approved, FWS will address this problem.



Billings, Montana
June 5, 1984

Regional Director (WR)
U. S. Fish and Wildlife Service
P. O. Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Sir:

Our Billings Rod and Gun Club offers the following comments on your February 23, 1984, Draft Environmental Impact Statement concerning the 1,094,301-acre, 125-mile long, Charles M. Russell National Wildlife Refuge, Montana.

It has been a long, difficult struggle to reach the recent milestone at CMR -- the appellate court ruling that assigned priority of forage to wildlife, and administration of the refuge under the Wildlife Refuge Act of 1966.

CMR, the second largest National Wildlife Refuge in the continental United States, now presents a unique, once in a lifetime opportunity to enhance habitats to achieve balanced populations of all forms of wildlife and fishes, and to orient hunting, fishing, and other public recreational pursuits toward the activities of all wildlife and fishes.

The livestock interests have dominated the refuge in the past. Now it is time for the U. S. Fish and Wildlife Service to flex its muscles and get on with the serious business of developing and managing CMR like the great National Wildlife Refuge that it is, in a manner consistent with applicable laws, policies, procedures, and the Service's special professional capabilities.

Therefore, our 1,000-member Billings Rod and Gun Club urges that you make CMR the greatest of all National Wildlife Refuges by adopting the Intensive Wildlife Management alternative.

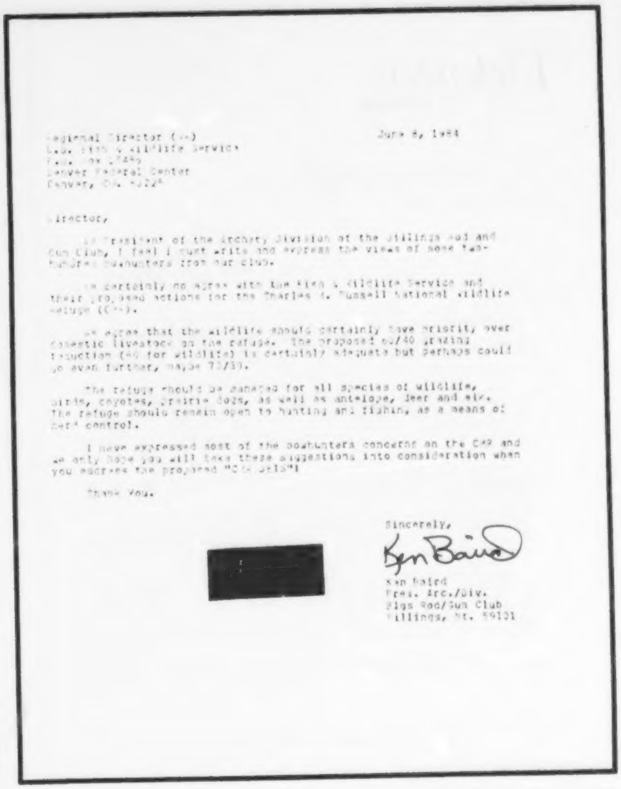
We appreciate the opportunity to comment on the draft EIS.

Sincerely yours,

Paul F. Berg

Paul F. Berg
Legislative Committee
Billings Rod and Gun Club
3708 Harry Cooper Place
Billings, Montana 59106

I concur
Dave Scott
Pres. BR&G Club



Regional Director (WR)
U.S. Fish & Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, CO. 80225

June 6, 1984

Director,

As President of the Archery Division of the Billings Rod and Gun Club, I feel I must write and express the views of some two-hundred bowhunters from our club.

We certainly do agree with the Fish & Wildlife Service and their proposed actions for the Charles M. Russell National Wildlife Refuge (CMR).

We agree that the wildlife should certainly have priority over domestic livestock on the refuge. The proposed 60/40 grazing reduction (60 for wildlife) is certainly adequate but perhaps could go even further, maybe 70/30.

The refuge should be managed for all species of wildlife, birds, coyotes, prairie dogs, as well as antelope, deer and elk. The refuge should remain open to hunting and fishing as a means of herd control.

I have expressed most of the bowhunters concerns on the CMR and we only hope you will take these suggestions into consideration when you address the proposed "CMR DEIS"!

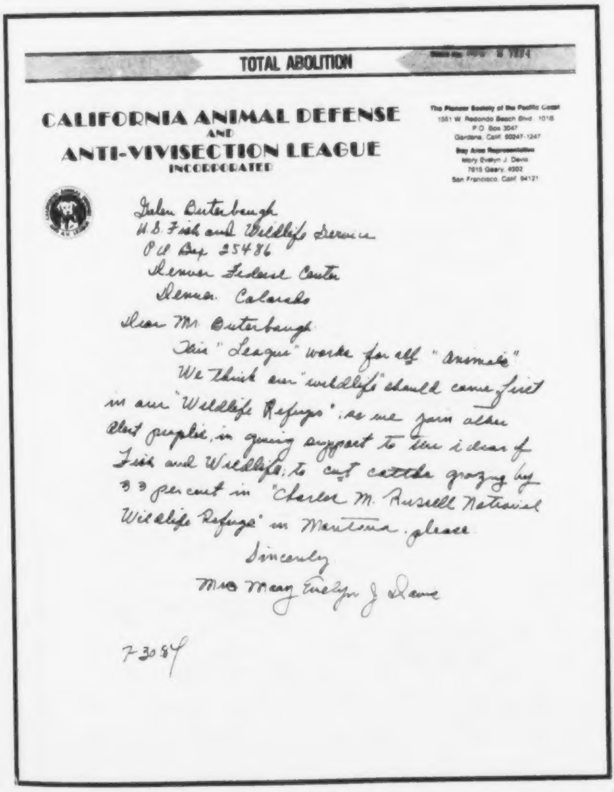
Thank You.

[redacted]

Sincerely,

Ken Baird

Ken Baird
Pres. Arc./Div.
Blgs Rod/Gun Club
Billings, Mt. 59101



TOTAL ABOLITION

CALIFORNIA ANIMAL DEFENSE
AND
ANTI-VIVISECTION LEAGUE
INCORPORATED

The Pioneer Society of the Pacific Coast
1561 W. Redondo Beach Blvd. 101B
P.O. Box 3047
Gardena, Calif. 90247-1247
Bay Area Representative
Mary Evelyn J. Davis
7815 Geary, #302
San Francisco, Calif. 94121

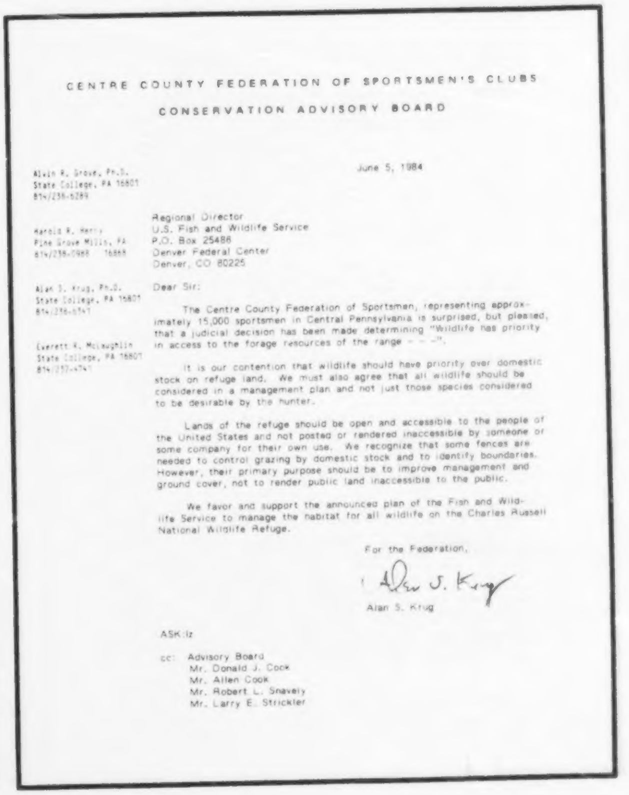
Galen Buterbaugh
U.S. Fish and Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver. Colorado

Dear Mr Buterbaugh

This "League" works for all "Animals"
We think our "wildlife" should come first in our "Wildlife Refuge", as we join other alert peoples, in giving support to the ideas of Fish and Wildlife, to cut cattle grazing by 33 percent in "Charles M. Russell National Wildlife Refuge" in Montana. please

Sincerely
Mrs Mary Evelyn J. Davis

7-30-84



CENTRE COUNTY FEDERATION OF SPORTSMEN'S CLUBS

CONSERVATION ADVISORY BOARD

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June 5, 1984

Regional Director
U.S. Fish and Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, CO 80225

Dear Sir:

The Centre County Federation of Sportsmen, representing approximately 15,000 sportsmen in Central Pennsylvania is surprised, but pleased, that a judicial decision has been made determining "Wildlife has priority in access to the forage resources of the range - - -".

It is our contention that wildlife should have priority over domestic stock on refuge land. We must also agree that all wildlife should be considered in a management plan and not just those species considered to be desirable by the hunter.

Lands of the refuge should be open and accessible to the people of the United States and not posted or rendered inaccessible by someone or some company for their own use. We recognize that some fences are needed to control grazing by domestic stock and to identify boundaries. However, their primary purpose should be to improve management and ground cover, not to render public land inaccessible to the public.

We favor and support the announced plan of the Fish and Wildlife Service to manage the habitat for all wildlife on the Charles Russell National Wildlife Refuge.

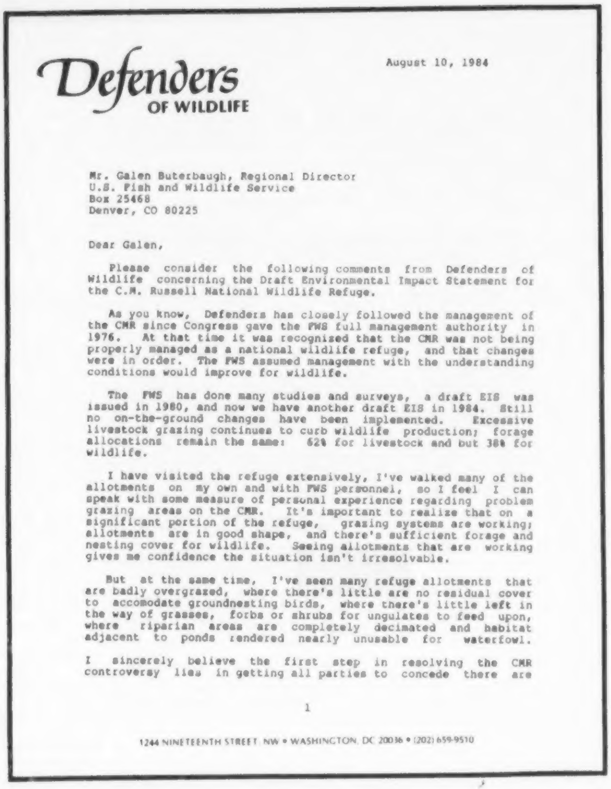
For the Federation,

Alan S. Krug

Alan S. Krug

ASK:lz

cc: Advisory Board
Mr. Donald J. Cook
Mr. Allen Cook
Mr. Robert L. Snavely
Mr. Larry E. Strickler



Defenders
OF WILDLIFE

August 10, 1984

Mr. Galen Buterbaugh, Regional Director
U.S. Fish and Wildlife Service
Box 25468
Denver, CO 80225

Dear Galen,

Please consider the following comments from Defenders of Wildlife concerning the Draft Environmental Impact Statement for the C.M. Russell National Wildlife Refuge.

As you know, Defenders has closely followed the management of the CMR since Congress gave the FWS full management authority in 1976. At that time it was recognized that the CMR was not being properly managed as a national wildlife refuge, and that changes were in order. The FWS assumed management with the understanding conditions would improve for wildlife.

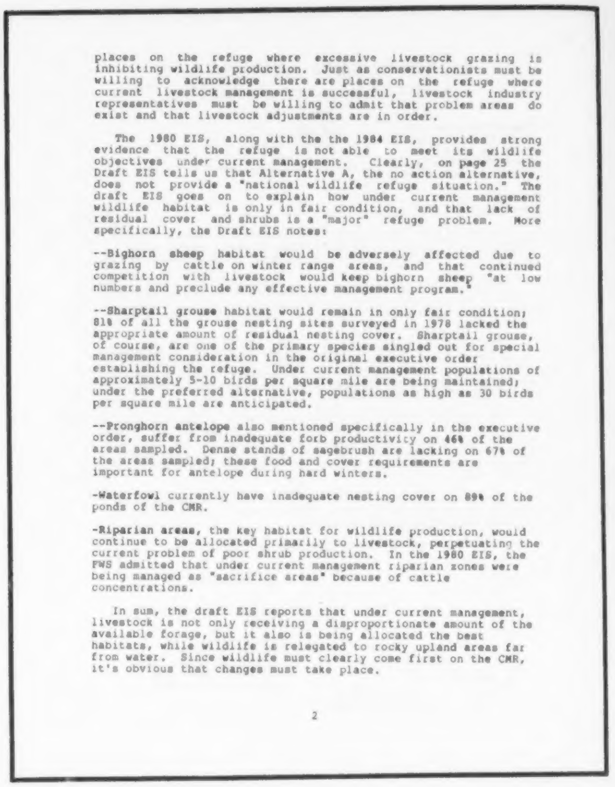
The FWS has done many studies and surveys, a draft EIS was issued in 1980, and now we have another draft EIS in 1984. Still no on-the-ground changes have been implemented. Excessive livestock grazing continues to curb wildlife production; forage allocations remain the same: 62% for livestock and but 38% for wildlife.

I have visited the refuge extensively, I've walked many of the allotments on my own and with FWS personnel, so I feel I can speak with some measure of personal experience regarding problem grazing areas on the CMR. It's important to realize that on a significant portion of the refuge, grazing systems are working; allotments are in good shape, and there's sufficient forage and nesting cover for wildlife. Seeing allotments that are working gives me confidence the situation isn't irresolvable.

But at the same time, I've seen many refuge allotments that are badly overgrazed, where there's little are no residual cover to accomodate groundnesting birds, where there's little left in the way of grasses, forbs or shrubs for ungulates to feed upon, where riparian areas are completely decimated and habitat adjacent to ponds rendered nearly unusable for waterfowl.

I sincerely believe the first step in resolving the CMR controversy lies in getting all parties to concede there are places on the refuge where excessive livestock grazing is inhibiting wildlife production. Just as conservationists must be willing to acknowledge there are places on the refuge where current livestock management is successful, livestock industry representatives must be willing to admit that problem areas do exist and that livestock adjustments are in order.

1244 NINETEENTH STREET, NW • WASHINGTON, DC 20036 • (202) 659-9510



The 1980 EIS, along with the the 1984 EIS, provides strong evidence that the refuge is not able to meet its wildlife objectives under current management. Clearly, on page 25 the Draft EIS tells us that Alternative A, the no action alternative, does not provide a "national wildlife refuge situation." The draft EIS goes on to explain how under current management wildlife habitat is only in fair condition, and that lack of residual cover and shrubs is a "major" refuge problem. More specifically, the Draft EIS notes:

--**Bighorn sheep** habitat would be adversely affected due to grazing by cattle on winter range areas, and that continued competition with livestock would keep bighorn sheep "at low numbers and preclude any effective management program."

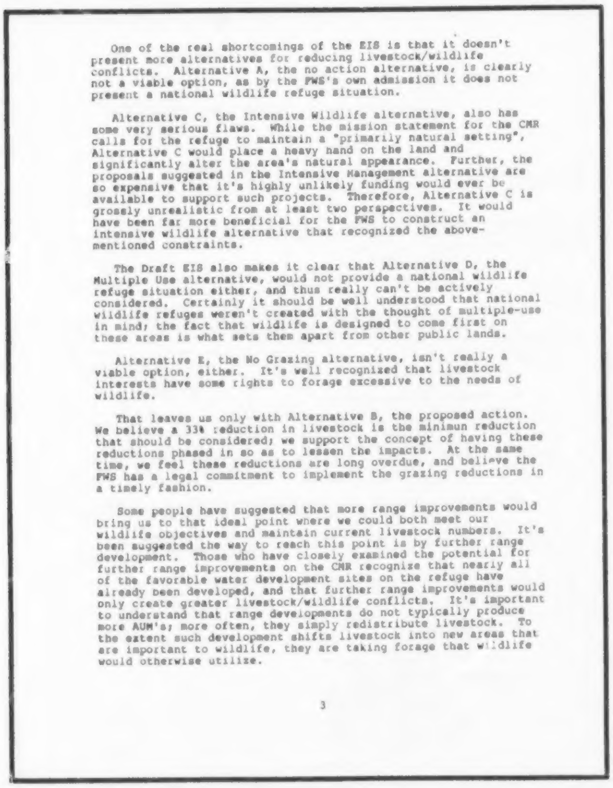
--**Sharptail grouse** habitat would remain in only fair condition; 81% of all the grouse nesting sites surveyed in 1978 lacked the appropriate amount of residual nesting cover. Sharptail grouse, of course, are one of the primary species singled out for special management consideration in the original executive order establishing the refuge. Under current management populations of approximately 5-10 birds per square mile are being maintained; under the preferred alternative, populations as high as 30 birds per square mile are anticipated.

--**Pronghorn antelope** also mentioned specifically in the executive order, suffer from inadequate forb productivity on 46% of the areas sampled. Dense stands of sagebrush are lacking on 67% of the areas sampled; these food and cover requirements are important for antelope during hard winters.

-**Waterfowl** currently have inadequate nesting cover on 89% of the ponds of the CMR.

-**Riparian areas**, the key habitat for wildlife production, would continue to be allocated primarily to livestock, perpetuating the current problem of poor shrub production. In the 1980 EIS, the FWS admitted that under current management riparian zones were being managed as "sacrifice areas" because of cattle concentrations.

In sum, the draft EIS reports that under current management, livestock is not only receiving a disproportionate amount of the available forage, but it also is being allocated the best habitats, while wildlife is relegated to rocky upland areas far from water. Since wildlife must clearly come first on the CMR, it's obvious that changes must take place.



One of the real shortcomings of the EIS is that it doesn't present more alternatives for reducing livestock/wildlife conflicts. Alternative A, the no action alternative, is clearly not a viable option, as by the FWS's own admission it does not present a national wildlife refuge situation.

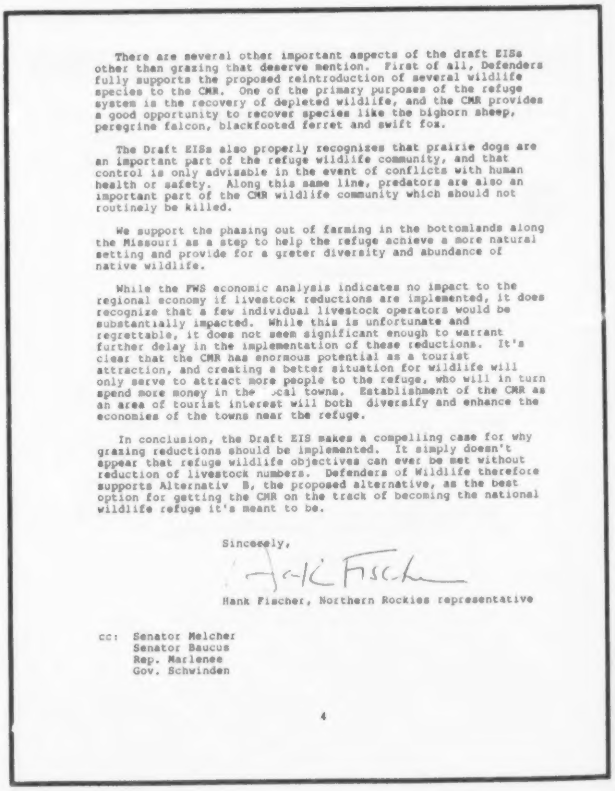
Alternative C, the Intensive Wildlife alternative, also has some very serious flaws. While the mission statement for the CMR calls for the refuge to maintain a "primarily natural setting", Alternative C would place a heavy hand on the land and significantly alter the area's natural appearance. Further, the proposals suggested in the Intensive Management alternative are so expensive that it's highly unlikely funding would ever be available to support such projects. Therefore, Alternative C is grossly unrealistic from at least two perspectives. It would have been far more beneficial for the FWS to construct an intensive wildlife alternative that recognized the above-mentioned constraints.

The Draft EIS also makes it clear that Alternative D, the Multiple Use alternative, would not provide a national wildlife refuge situation either, and thus really can't be actively considered. Certainly it should be well understood that national wildlife refuges weren't created with the thought of multiple-use in mind; the fact that wildlife is designed to come first on these areas is what sets them apart from other public lands.

Alternative E, the No Grazing alternative, isn't really a viable option, either. It's well recognized that livestock interests have some rights to forage excessive to the needs of wildlife.

That leaves us only with Alternative B, the proposed action. We believe a 33% reduction in livestock is the minimun reduction that should be considered; we support the concept of having these reductions phased in so as to lessen the impacts. At the same time, we feel these reductions are long overdue, and believe the FWS has a legal commitment to implement the grazing reductions in a timely fashion.

Some people have suggested that more range improvements would bring us to that ideal point where we could both meet our wildlife objectives and maintain current livestock numbers. It's been suggested the way to reach this point is by further range development. Those who have closely examined the potential for further range improvements on the CMR recognize that nearly all of the favorable water development sites on the refuge have already been developed, and that further range improvements would only create greater livestock/wildlife conflicts. It's important to understand that range developments do not typically produce more AUM's; more often, they simply redistribute livestock. To the extent such development shifts livestock into new areas that are important to wildlife, they are taking forage that wildlife would otherwise utilize.



There are several other important aspects of the draft EISs other than grazing that deserve mention. First of all, Defenders fully supports the proposed reintroduction of several wildlife species to the CMR. One of the primary purposes of the refuge system is the recovery of depleted wildlife, and the CMR provides a good opportunity to recover species like the bighorn sheep, peregrine falcon, blackfooted ferret and swift fox.

The Draft EISs also properly recognizes that prairie dogs are an important part of the refuge wildlife community, and that control is only advisable in the event of conflicts with human health or safety. Along this same line, predators are also an important part of the CMR wildlife community which should not routinely be killed.

We support the phasing out of farming in the bottomlands along the Missouri as a step to help the refuge achieve a more natural setting and provide for a greter diversity and abundance of native wildlife.

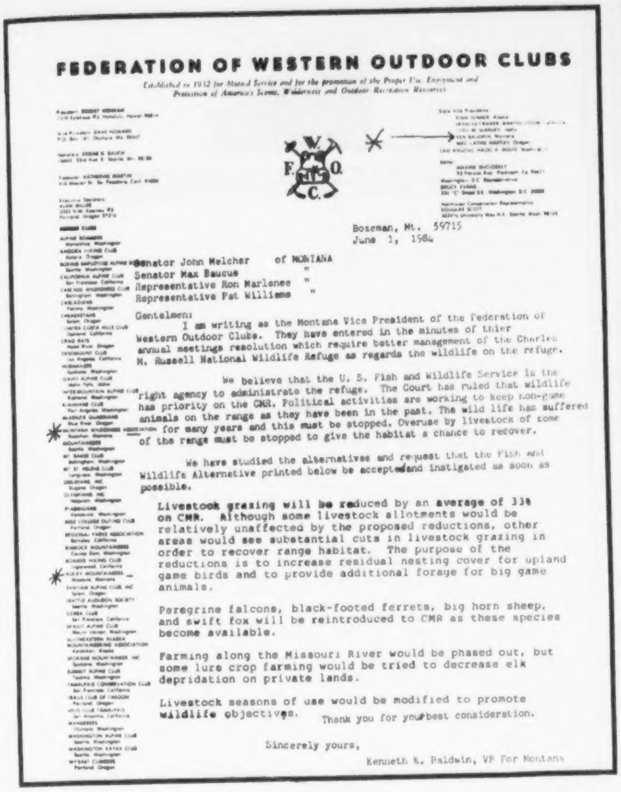
While the FWS economic analysis indicates no impact to the regional economy if livestock reductions are implemented, it does recognize that a few individual livestock operators would be substantially impacted. While this is unfortunate and regrettable, it does not seem significant enough to warrant further delay in the implementation of these reductions. It's clear that the CMR has enormous potential as a tourist attraction, and creating a better situation for wildlife will only serve to attract more people to the refuge, who will in turn spend more money in the local towns. Establishment of the CMR as an area of tourist interest will both diversify and enhance the economies of the towns near the refuge.

In conclusion, the Draft EIS makes a compelling case for why grazing reductions should be implemented. It simply doesn't appear that refuge wildlife objectives can ever be met without reduction of livestock numbers. Defenders of Wildlife therefore supports Alternativ B, the proposed alternative, as the best option for getting the CMR on the track of becoming the national wildlife refuge it's meant to be.

Sincerely,

Hank Fischer, Northern Rockies representative

cc: Senator Melcher
Senator Baucus
Rep. Marlenee
Gov. Schwinden



FEDERATION OF WESTERN OUTDOOR CLUBS

Established in 1932 for Mutual Service and for the promotion of the Proper Use, Enjoyment and Protection of America's Scenic, Wilderness and Outdoor Recreation Resources

W. F. O. C.

Bozeman, Mt. 59715
June 1, 1984

Senator John Melcher of MONTANA
Senator Max Baucus "
Representative Ron Marlenee "
Representative Pat Williams "

Gentelmen:

I am writing as the Montana Vice President of the Federation of Western Outdoor Clubs. They have entered in the minutes of thier annual meetings resolution which require better management of the Charles M. Russell National Wildlife Refuge as regards the wildlife on the refuge.

We believe that the U. S. Fish and Wildlife Service is the right agency to administrate the refuge. The Court has ruled that wildlife has priority on the CMR. Political activities are working to keep non-game animals on the range as they have been in the past. The wild life has suffered for many years and this must be stopped. Overuse by livestock of some of the range must be stopped to give the habitat a chance to recover.

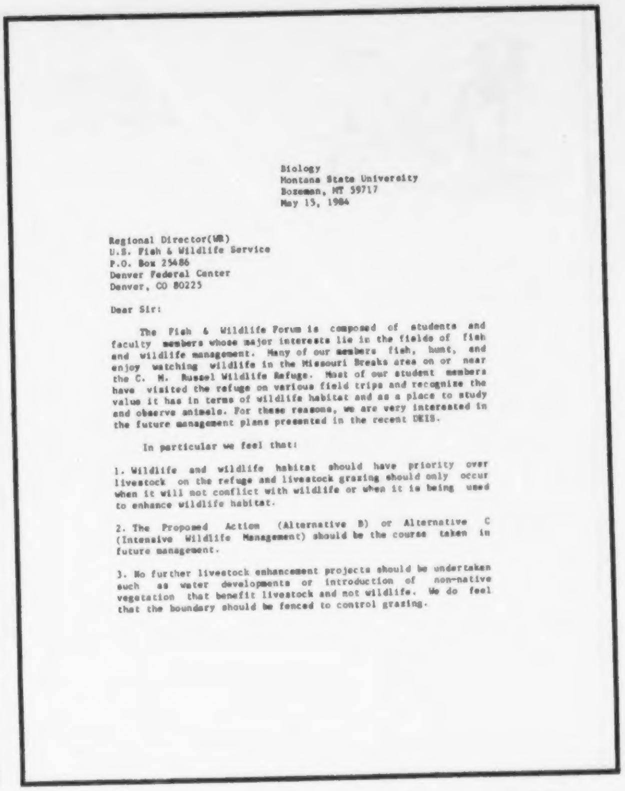
We have studied the alternatives and request that the Fish and Wildlife Alternative printed below be accepted and instigated as soon as possible.

> Livestock grazing will be reduced by an average of 33% on CMR. Although some livestock allotments would be relatively unaffected by the proposed reductions, other areas would see substantial cuts in livestock grazing in order to recover range habitat. The purpose of the reductions is to increase residual nesting cover for upland game birds and to provide additional forage for big game animals.
>
> Peregrine falcons, black-footed ferrets, big horn sheep, and swift fox will be reintroduced to CMR as these species become available.
>
> Farming along the Missouri River would be phased out, but some lure crop farming would be tried to decrease elk depridation on private lands.
>
> Livestock seasons of use would be modified to promote wildlife objectives.

Thank you for your best consideration.

Sincerely yours,

Kenneth K. Baldwin, VP For Montana



Biology
Montana State University
Bozeman, MT 59717
May 15, 1984

Regional Director(WR)
U.S. Fish & Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, CO 80225

Dear Sir:

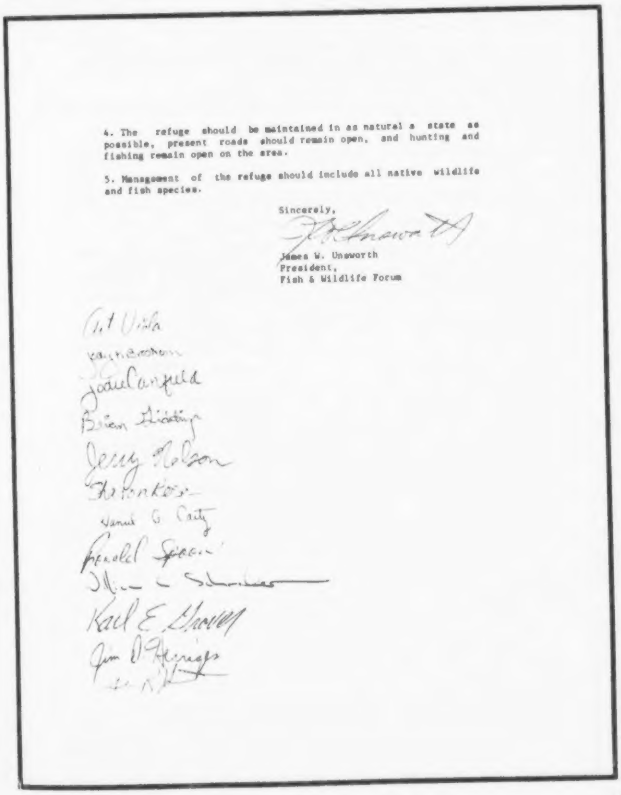
The Fish & Wildlife Forum is composed of students and faculty members whose major interests lie in the fields of fish and wildlife management. Many of our members fish, hunt, and enjoy watching wildlife in the Missouri Breaks area on or near the C. M. Russel Wildlife Refuge. Most of our student members have visited the refuge on various field trips and recognize the value it has in terms of wildlife habitat and as a place to study and observe animals. For these reasons, we are very interested in the future management plans presented in the recent DEIS.

In particular we feel that:

1. Wildlife and wildlife habitat should have priority over livestock on the refuge and livestock grazing should only occur when it will not conflict with wildlife or when it is being used to enhance wildlife habitat.

2. The Proposed Action (Alternative B) or Alternative C (Intensive Wildlife Management) should be the course taken in future management.

3. No further livestock enhancement projects should be undertaken such as water developments or introduction of non-native vegetation that benefit livestock and not wildlife. We do feel that the boundary should be fenced to control grazing.



4. The refuge should be maintained in as natural a state as possible, present roads should remain open, and hunting and fishing remain open on the area.

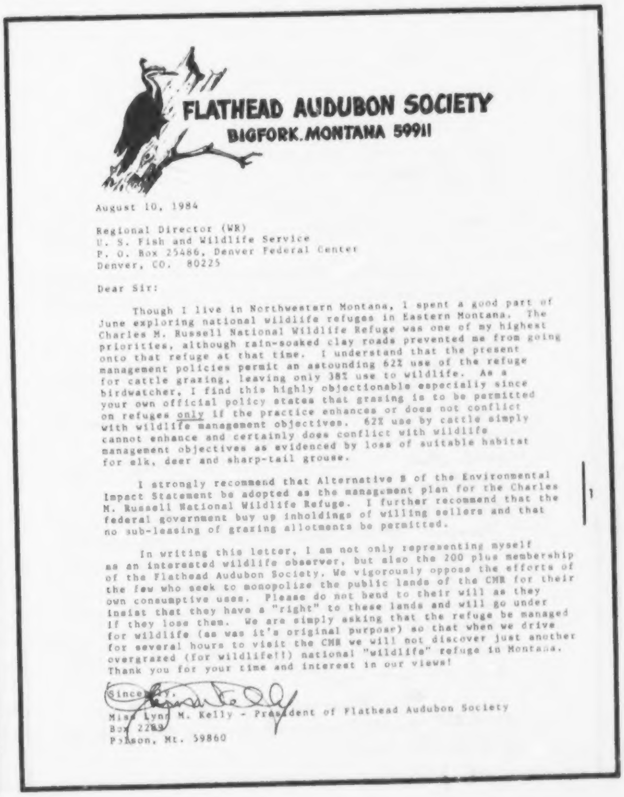
5. Management of the refuge should include all native wildlife and fish species.

Sincerely,

James W. Unsworth
President,
Fish & Wildlife Forum

Jodie Canfield

Jerry Nelson



FLATHEAD AUDUBON SOCIETY
BIGFORK, MONTANA 59911

August 10, 1984

Regional Director (WR)
U. S. Fish and Wildlife Service
P. O. Box 25486, Denver Federal Center
Denver, CO. 80225

Dear Sir:

Though I live in Northwestern Montana, I spent a good part of June exploring national wildlife refuges in Eastern Montana. The Charles M. Russell National Wildlife Refuge was one of my highest priorities, although rain-soaked clay roads prevented me from going onto that refuge at that time. I understand that the present management policies permit an astounding 62% use of the refuge for cattle grazing, leaving only 38% use to wildlife. As a birdwatcher, I find this highly objectionable especially since your own official policy states that grazing is to be permitted on refuges only if the practice enhances or does not conflict with wildlife management objectives. 62% use by cattle simply cannot enhance and certainly does conflict with wildlife management objectives as evidenced by loss of suitable habitat for elk, deer and sharp-tail grouse.

I strongly recommend that Alternative B of the Environmental Impact Statement be adopted as the management plan for the Charles M. Russell National Wildlife Refuge. I further recommend that the federal government buy up inholdings of willing sellers and that no sub-leasing of grazing allotments be permitted. 1

In writing this letter, I am not only representing myself as an interested wildlife observer, but also the 200 plus membership of the Flathead Audubon Society. We vigorously oppose the efforts of the few who seek to monopolize the public lands of the CMR for their own consumptive uses. Please do not bend to their will as they insist that they have a "right" to these lands and will go under if they lose them. We are simply asking that the refuge be managed for wildlife (as was it's original purpose) so that when we drive for several hours to visit the CMR we will not discover just another overgrazed (for wildlife!!) national "wildlife" refuge in Montana. Thank you for your time and interest in our views!

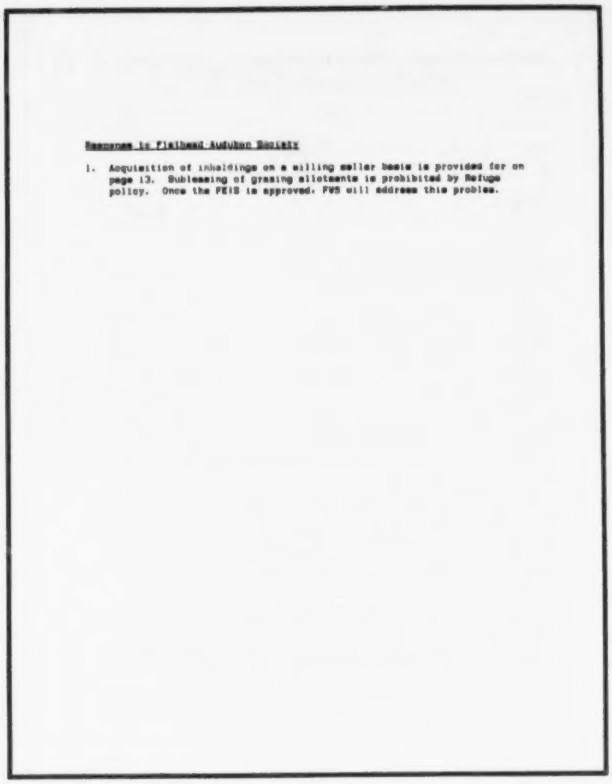
Sincerely,

Lynn Kelly

Miss Lynn M. Kelly - President of Flathead Audubon Society
Box 2289
Polson, Mt. 59860

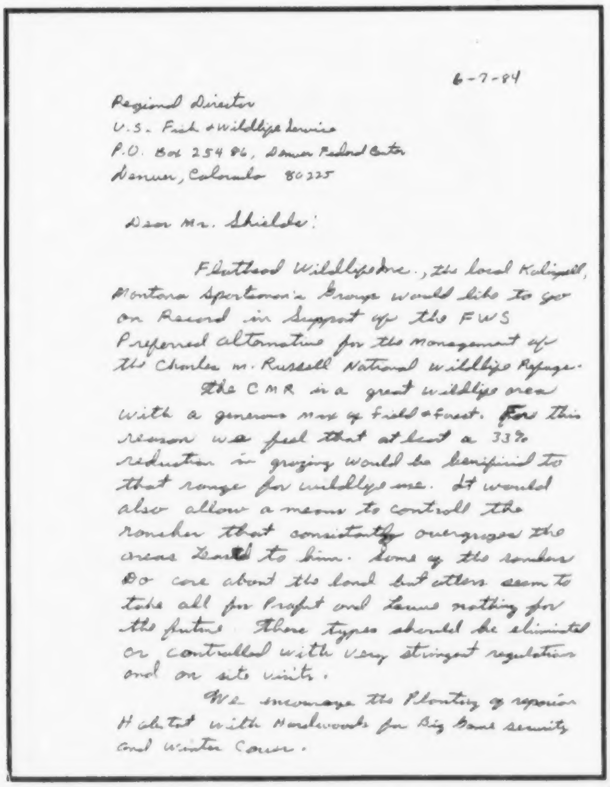
Regional Director
Page 2

cc: Senator John Melcher
Senator Max Baucus
Representative Ron Marlenee
Representative Pat Williams



Response to Flathead Audubon Society

1. Acquisition of inholdings on a willing seller basis is provided for on page 13. Subleasing of grazing allotments is prohibited by Refuge policy. Once the FEIS is approved, FWS will address this problem.



6-7-84

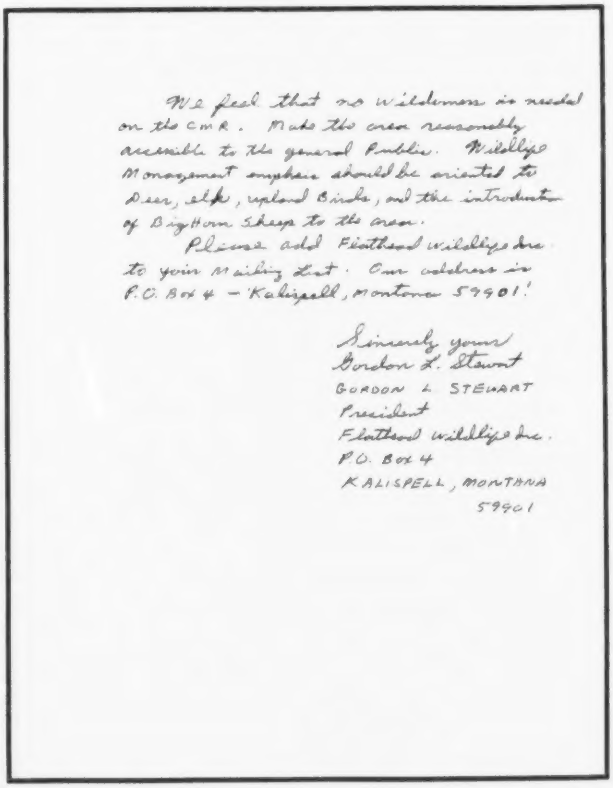
Regional Director
U.S. Fish & Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, Colorado 80225

Dear Mr. Shields:

Flathead Wildlife Inc., the local Kalispell, Montana Sportsman's Group would like to go on Record in Support of the FWS Preferred alternative for the management of the Charles M. Russell National Wildlife Refuge.

The CMR is a great wildlife area with a generous mix of field & forest. For this reason we feel that at least a 33% reduction in grazing would be benificial to that range for wildlife use. It would also allow a means to controll the rancher that consistantly overgrazes the areas Leased to him. Some of the ranchers Do care about the land but others seem to take all for Profit and Leave nothing for the future. These types should be eliminated or controlled with very stringent regulations and on site visits.

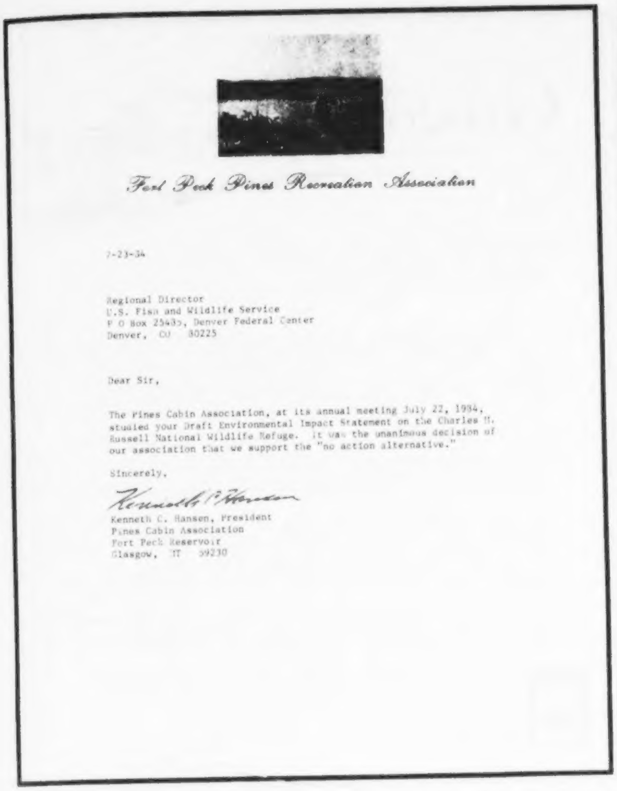
We encourage the Planting of riparian Habitat with Hardwoods for Big Game security and Winter Cover.



We feel that no Wilderness is needed on the CMR. Make the area reasonably accessible to the general Public. Wildlife Management emphasis should be oriented to Deer, elk, upland Birds, and the introduction of BigHorn Sheep to the area.

Please add Flathead Wildlife Inc to your Mailing List. Our address is P.O. Box 4 - Kalispell, Montana 59901.

Sincerely yours
Gordon L. Stewart
GORDON L STEWART
President
Flathead Wildlife Inc.
P.O. Box 4
KALISPELL, MONTANA
59901



Fort Peck Pines Recreation Association

7-23-84

Regional Director
U.S. Fish and Wildlife Service
P O Box 25486, Denver Federal Center
Denver, CO 80225

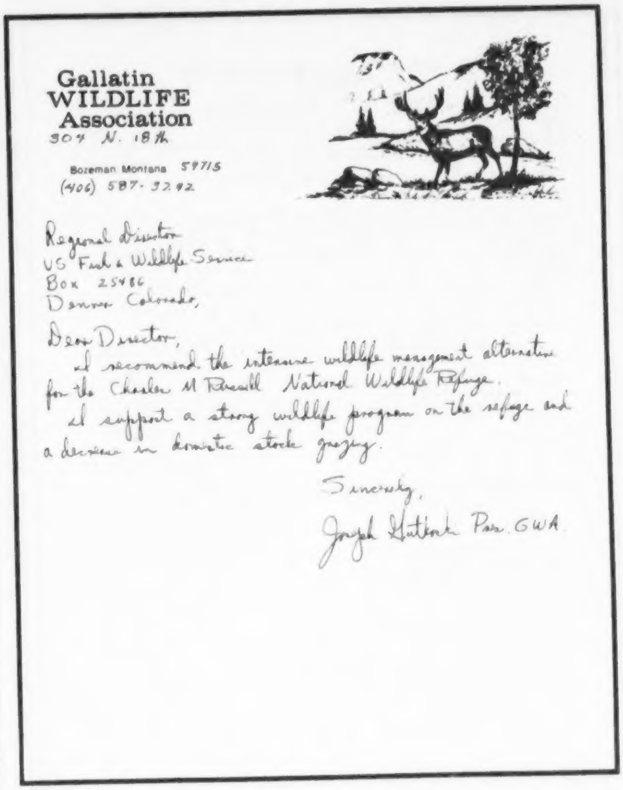
Dear Sir,

The Pines Cabin Association, at its annual meeting July 22, 1984, studied your Draft Environmental Impact Statement on the Charles M. Russell National Wildlife Refuge. It was the unanimous decision of our association that we support the "no action alternative."

Sincerely,

Kenneth C Hansen

Kenneth C. Hansen, President
Pines Cabin Association
Fort Peck Reservoir
Glasgow, MT 59230



Gallatin
WILDLIFE
Association
304 N. 18th

Bozeman Montana 59715
(406) 587-3292

Regional Director
US Fish & Wildlife Service
Box 25486
Denver Colorado,

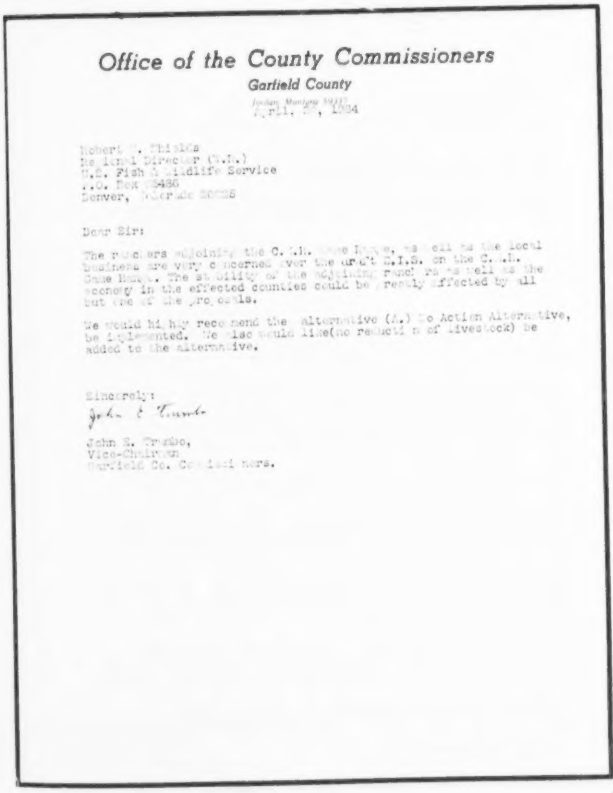
Dear Director,

I recommend the intensive wildlife management alternative for the Charles M Russell National Wildlife Refuge.

I support a strong wildlife program on the refuge and a decrease in domestic stock grazing.

Sincerely,

Joseph Gutkoski Pres. GWA



Office of the County Commissioners
Garfield County
Jordan, Montana 59337
April [illegible], 1984

Robert [illegible]
Regional Director ([illegible])
U.S. Fish & Wildlife Service
P.O. Box 25486
Denver, Colorado 80225

Dear Sir:

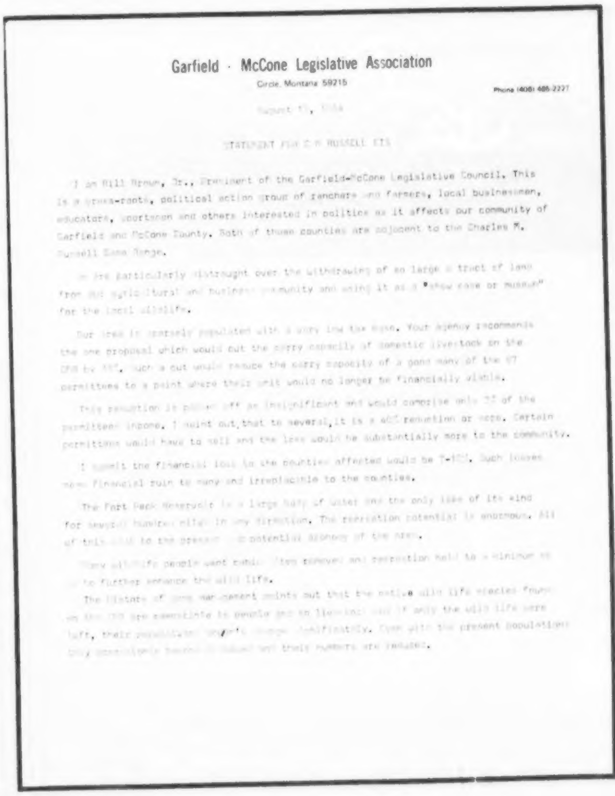
The ranchers adjoining the C.M.R. Game Range, as well as the local business are very concerned over the draft E.I.S. on the C.M.R. Game Range. The stability of the adjoining ranchers as well as the economy in the effected counties could be greatly effected by all but one of the proposals.

We would highly recommend the alternative (A.) No Action Alternative, be implemented. We also would like(no reduction of livestock) be added to the alternative.

Sincerely:

John E. Trumbo

John E. Trumbo,
Vice-Chairman
Garfield Co. Commissioners.



Garfield · McCone Legislative Association
Circle, Montana 59215
Phone (406) 485-2227

August [illegible], 1984

STATEMENT FOR C M RUSSELL EIS

I am Bill Brown, Jr., President of the Garfield-McCone Legislative Council. This is a grass-roots, political action group of ranchers and farmers, local businessmen, educators, sportsmen and others interested in politics as it affects our community of Garfield and McCone County. Both of these counties are adjacent to the Charles M. Russell Game Range.

We are particularly distrought over the withdrawing of so large a tract of land from our agricultural and business community and using it as a "show case or museum" for the local wildlife.

Our area is sparsely populated with a very low tax base. Your agency recommends the one proposal which would cut the carry capacity of domestic livestock on the CMR by [illegible]. Such a cut would reduce the carry capacity of a good many of the [illegible] permittees to a point where their unit would no longer be financially viable.

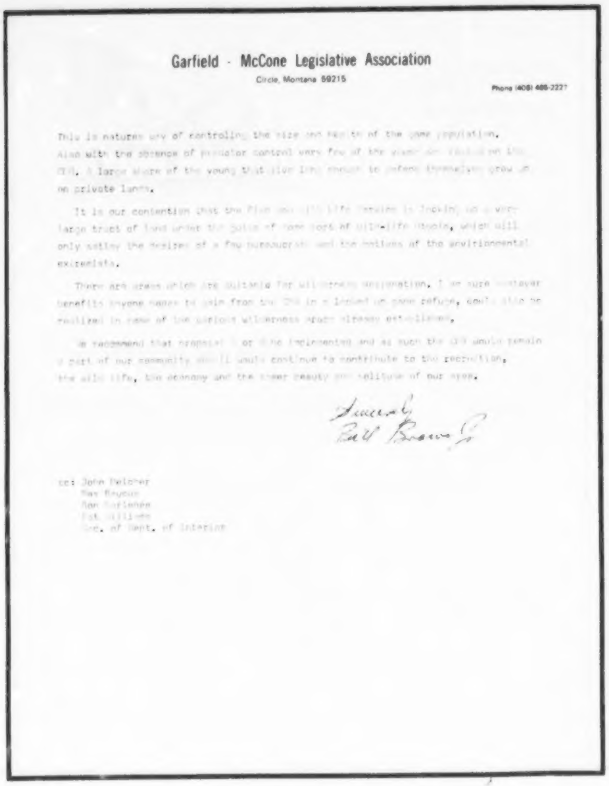
This reduction is passed off as insignificant and would comprise only [illegible] of the permittees income. I point out, that to several, it is a 40% reduction or more. Certain permittees would have to sell and the loss would be substantially more to the community.

I submit the financial loss to the counties affected would be 7-10%. Such losses mean financial ruin to many and irreplacable to the counties.

The Fort Peck Reservoir is a large body of water and the only lake of its kind for several hundred miles in any direction. The recreation potential is enormous. All of this adds to the present and potential economy of the area.

Many wildlife people want public [illegible] removed and recreation held to a minimum so as to further enhance the wild life.

The history of game management points out that the native wild life species found on the CMR are compatible to people and to livestock and if only the wild life were left, their populations would change significantly. Even with the present populations they occasionally become diseased and their numbers are reduced.



Garfield - McCone Legislative Association
Circle, Montana 59215
Phone (406) 485-2227

This is natures way of controlling the size and health of the game population. Also with the absence of predator control very few of the young are raised on the CMR. A large share of the young that live long enough to defend themselves grow up on private lands.

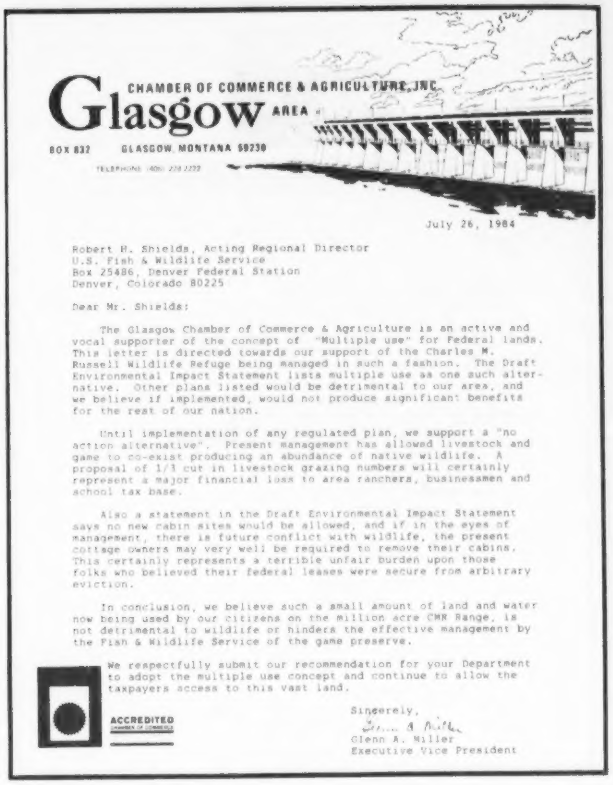
It is our contention that the Fish and Wild Life Service is locking up a very large tract of land under the guise of some sort of wild-life utopia, which will only satisfy the desires of a few bureaucrats and the notions of the environmental extremists.

There are areas which are suitable for wilderness designation. I am sure whatever benefits anyone hopes to gain from the CMR in a locked up game refuge, would also be realized in some of the various wilderness areas already established.

We recommend that proposal 1 or 4 be implemented and as such the CMR would remain a part of our community and it would continue to contribute to the recreation, the wild life, the economy and the sheer beauty and solitude of our area.

Sincerely
Bill Brown Jr.

cc: John Melcher
Max Baucus
Ron Marlenee
Pat Williams
Sec. of Dept. of Interior



Glasgow AREA
CHAMBER OF COMMERCE & AGRICULTURE, INC
BOX 832 GLASGOW, MONTANA 59230
TELEPHONE (406) 228-2222

July 26, 1984

Robert H. Shields, Acting Regional Director
U.S. Fish & Wildlife Service
Box 25486, Denver Federal Station
Denver, Colorado 80225

Dear Mr. Shields:

The Glasgow Chamber of Commerce & Agriculture is an active and vocal supporter of the concept of "Multiple use" for Federal lands. This letter is directed towards our support of the Charles M. Russell Wildlife Refuge being managed in such a fashion. The Draft Environmental Impact Statement lists multiple use as one such alternative. Other plans listed would be detrimental to our area, and we believe if implemented, would not produce significant benefits for the rest of our nation.

Until implementation of any regulated plan, we support a "no action alternative". Present management has allowed livestock and game to co-exist producing an abundance of native wildlife. A proposal of 1/3 cut in livestock grazing numbers will certainly represent a major financial loss to area ranchers, businessmen and school tax base.

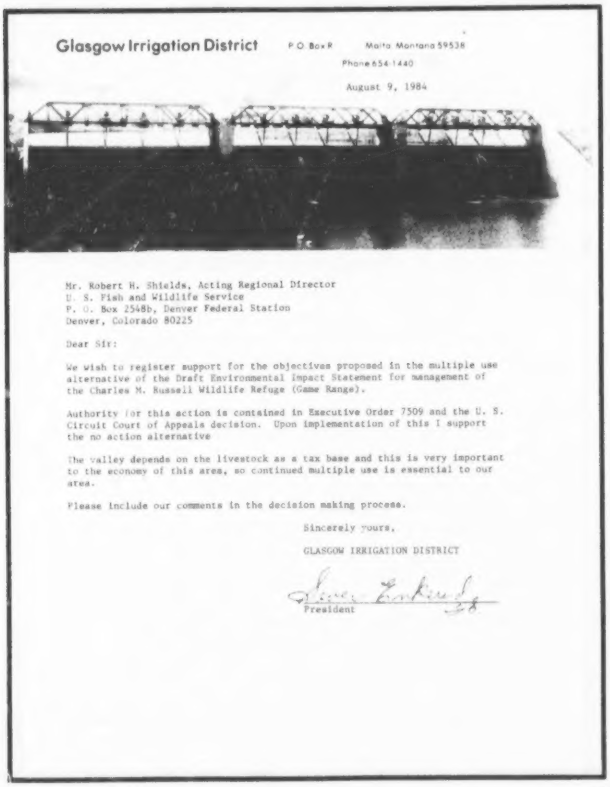
Also a statement in the Draft Environmental Impact Statement says no new cabin sites would be allowed, and if in the eyes of management, there is future conflict with wildlife, the present cottage owners may very well be required to remove their cabins. This certainly represents a terrible unfair burden upon those folks who believed their federal leases were secure from arbitrary eviction.

In conclusion, we believe such a small amount of land and water now being used by our citizens on the million acre CMR Range, is not detrimental to wildlife or hinders the effective management by the Fish & Wildlife Service of the game preserve.

We respectfully submit our recommendation for your Department to adopt the multiple use concept and continue to allow the taxpayers access to this vast land.

ACCREDITED
CHAMBER OF COMMERCE

Sincerely,
Glenn A. Miller
Executive Vice President



Glasgow Irrigation District P.O. Box R Malta Montana 59538
Phone 654-1440

August 9, 1984

Mr. Robert H. Shields, Acting Regional Director
U. S. Fish and Wildlife Service
P. O. Box 2548b, Denver Federal Station
Denver, Colorado 80225

Dear Sir:

We wish to register support for the objectives proposed in the multiple use alternative of the Draft Environmental Impact Statement for management of the Charles M. Russell Wildlife Refuge (Game Range).

Authority for this action is contained in Executive Order 7509 and the U. S. Circuit Court of Appeals decision. Upon implementation of this I support the no action alternative

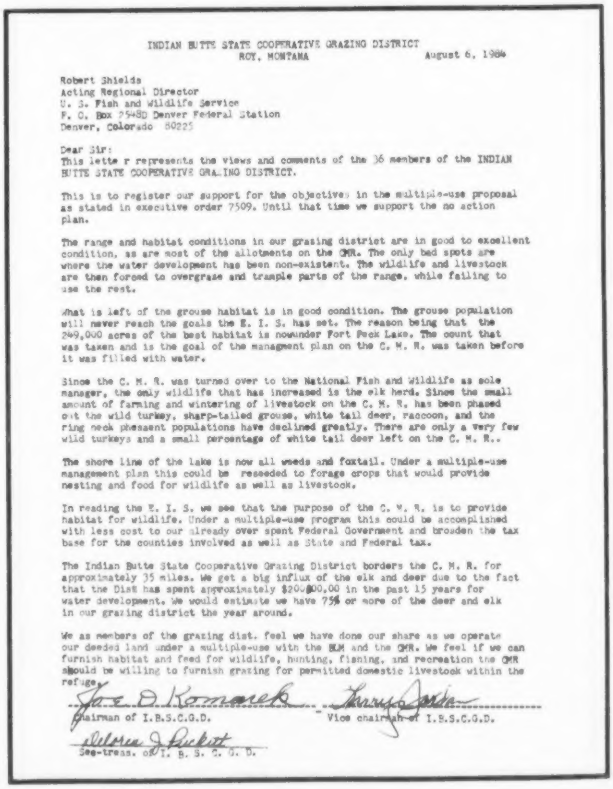
The valley depends on the livestock as a tax base and this is very important to the economy of this area, so continued multiple use is essential to our area.

Please include our comments in the decision making process.

Sincerely yours,

GLASGOW IRRIGATION DISTRICT

President



INDIAN BUTTE STATE COOPERATIVE GRAZING DISTRICT
ROY, MONTANA

August 6, 1984

Robert Shields
Acting Regional Director
U. S. Fish and Wildlife Service
P. O. Box 25480 Denver Federal Station
Denver, Colorado 80225

Dear Sir:

This lette r represents the views and comments of the 36 members of the INDIAN BUTTE STATE COOPERATIVE GRAZING DISTRICT.

This is to register our support for the objectives in the multiple-use proposal as stated in executive order 7509. Until that time we support the no action plan.

The range and habitat conditions in our grazing district are in good to excellent condition, as are most of the allotments on the CMR. The only bad spots are where the water development has been non-existent. The wildlife and livestock are then forced to overgrase and trample parts of the range, while failing to use the rest.

What is left of the grouse habitat is in good condition. The grouse population will never reach the goals the E. I. S. has set. The reason being that the 249,000 acres of the best habitat is nowunder Fort Peck Lake. The count that was taken and is the goal of the managment plan on the C. M. R. was taken before it was filled with water.

Since the C. M. R. was turned over to the National Fish and Wildlife as sole manager, the only wildlife that has increased is the elk herd. Since the small amount of farming and wintering of livestock on the C. M. R. has been phased out the wild turkey, sharp-tailed grouse, white tail deer, raccoon, and the ring neck phesaent populations have declined greatly. There are only a very few wild turkeys and a small percentage of white tail deer left on the C. M. R..

The shore line of the lake is now all weeds and foxtail. Under a multiple-use management plan this could be reseeded to forage crops that would provide nesting and food for wildlife as well as livestock.

In reading the E. I. S. we see that the purpose of the C. M. R. is to provide habitat for wildlife. Under a multiple-use program this could be accomplished with less cost to our already over spent Federal Government and broaden the tax base for the counties involved as well as State and Federal tax.

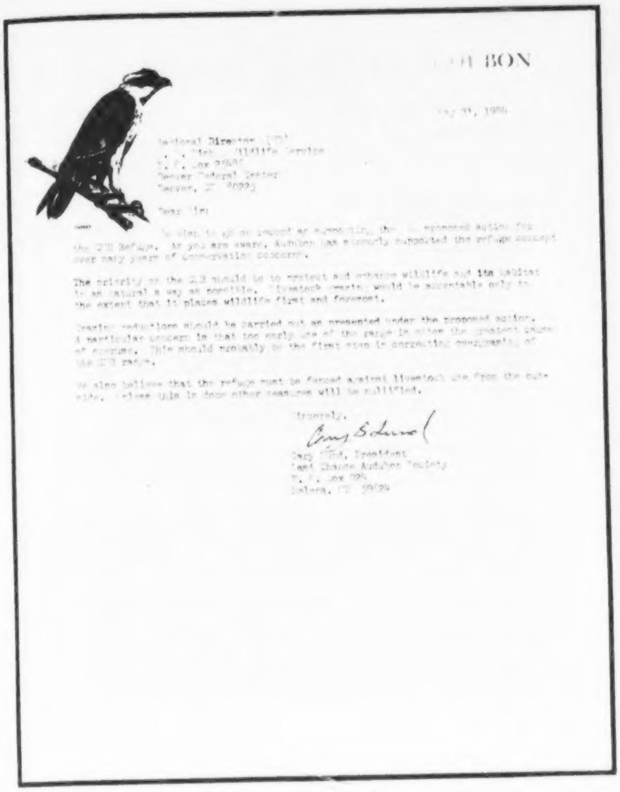
The Indian Butte State Cooperative Grazing District borders the C. M. R. for approximately 35 miles. We get a big influx of the elk and deer due to the fact that the Dist has spent approximately $200,000.00 in the past 15 years for water development. We would estimate we have 75% or more of the deer and elk in our grazing district the year around.

We as members of the grazing dist. feel we have done our share as we operate our deeded land under a multiple-use with the BLM and the CMR. We feel if we can furnish habitat and feed for wildlife, hunting, fishing, and recreation the CMR should be willing to furnish grazing for permitted domestic livestock within the refuge.

Joe D. Komarek
Chairman of I.B.S.C.G.D.

Vice chairman of I.B.S.C.G.D.

Delores J. Puckett
Sec-treas. of I. B. S. C. G. D.



AUDUBON

May 31, 1984

Regional Director [illegible]
U. S. Fish & Wildlife Service
P. O. Box 25486
Denver Federal Center
Denver, CO 80225

Dear Sir:

We wish to go on record as supporting the [illegible] proposed action for the CMR Refuge. As you are aware, Audubon has strongly supported the refuge concept over many years of conservation concern.

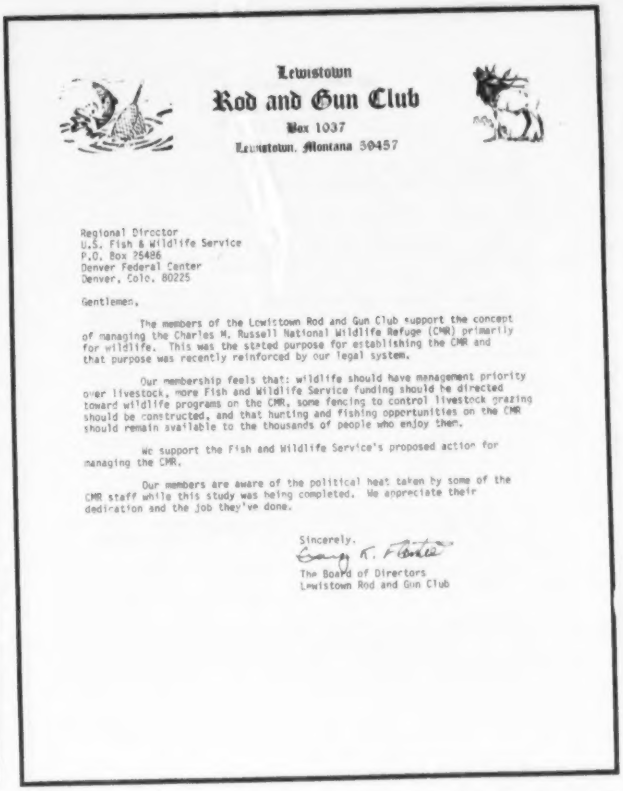
The priority on the CMR should be to protect and enhance wildlife and its habitat in as natural a way as possible. Livestock grazing would be acceptable only to the extent that it places wildlife first and foremost.

Grazing reductions should be carried out as presented under the proposed action. A particular concern is that too early use of the range is often the greatest cause of overuse. This should probably be the first step in correcting overgrazing of the CMR range.

We also believe that the refuge must be fenced against livestock use from the outside. Unless this is done other measures will be nullified.

Sincerely,

Gary [illegible], President
Last Chance Audubon Society
P. O. Box 924
Helena, MT 59624



Lewistown
Rod and Gun Club
Box 1037
Lewistown, Montana 59457

Regional Director
U.S. Fish & Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, Colo. 80225

Gentlemen,

The members of the Lewistown Rod and Gun Club support the concept of managing the Charles M. Russell National Wildlife Refuge (CMR) primarily for wildlife. This was the stated purpose for establishing the CMR and that purpose was recently reinforced by our legal system.

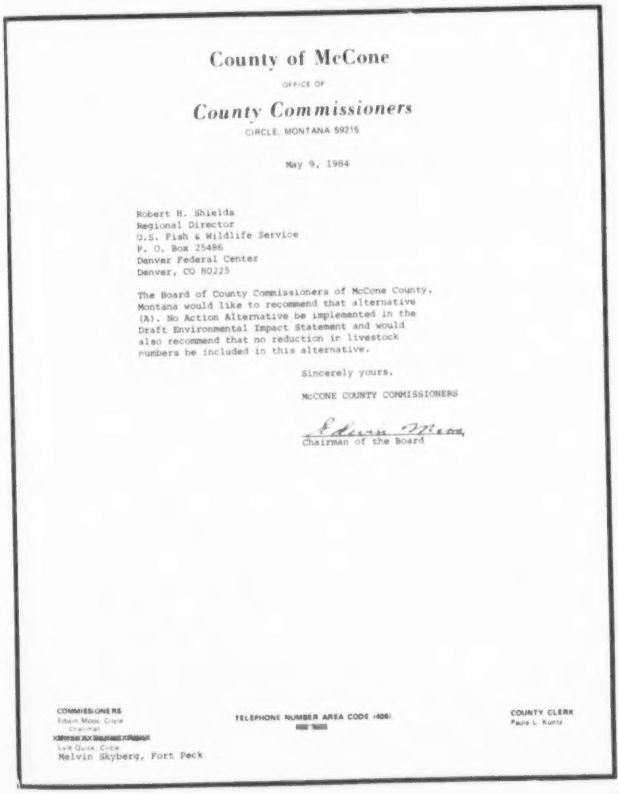
Our membership feels that: wildlife should have management priority over livestock, more Fish and Wildlife Service funding should be directed toward wildlife programs on the CMR, some fencing to control livestock grazing should be constructed, and that hunting and fishing opportunities on the CMR should remain available to the thousands of people who enjoy them.

We support the Fish and Wildlife Service's proposed action for managing the CMR.

Our members are aware of the political heat taken by some of the CMR staff while this study was being completed. We appreciate their dedication and the job they've done.

Sincerely,

The Board of Directors
Lewistown Rod and Gun Club



County of McCone

OFFICE OF

County Commissioners

CIRCLE, MONTANA 59215

May 9, 1984

Robert H. Shields
Regional Director
U.S. Fish & Wildlife Service
P. O. Box 25486
Denver Federal Center
Denver, CO 80225

The Board of County Commissioners of McCone County, Montana would like to recommend that alternative (A). No Action Alternative be implemented in the Draft Environmental Impact Statement and would also recommend that no reduction in livestock numbers be included in this alternative.

Sincerely yours,

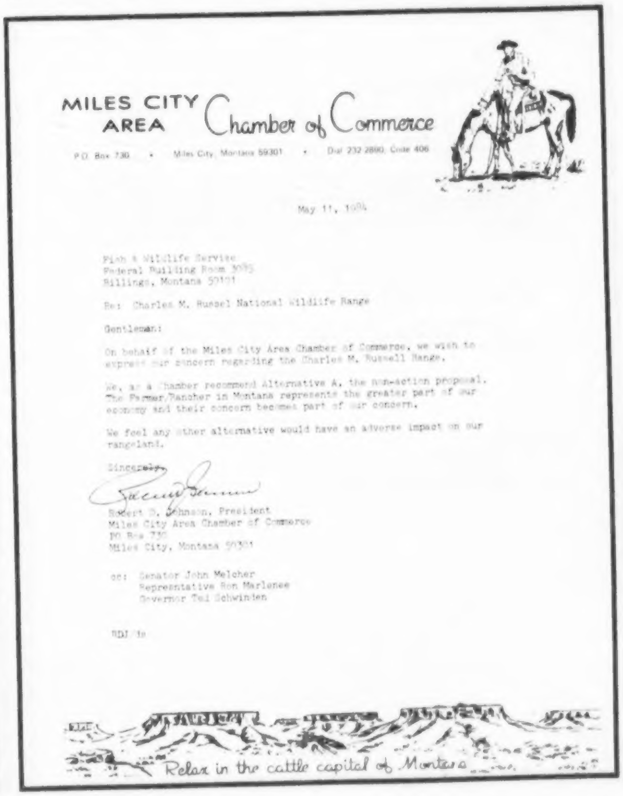
McCONE COUNTY COMMISSIONERS

Edwin Moss
Chairman of the Board

COMMISSIONERS
Edwin Moss, Circle
Chairman
[illegible]
Lyle Quick, Circle
Melvin Skyberg, Fort Peck

TELEPHONE NUMBER AREA CODE (406)
[redacted]

COUNTY CLERK
Paula L. Kuntz



MILES CITY AREA Chamber of Commerce

P.O. Box 730 • Miles City, Montana 59301 • Dial 232-2890, Code 406

May 11, 1984

Fish & Wildlife Service
Federal Building Room 3035
Billings, Montana 59101

Re: Charles M. Russel National Wildlife Range

Gentleman:

On behalf of the Miles City Area Chamber of Commerce, we wish to express our concern regarding the Charles M. Russell Range.

We, as a Chamber recommend Alternative A, the non-action proposal. The Farmer/Rancher in Montana represents the greater part of our economy and their concern becomes part of our concern.

We feel any other alternative would have an adverse impact on our rangeland.

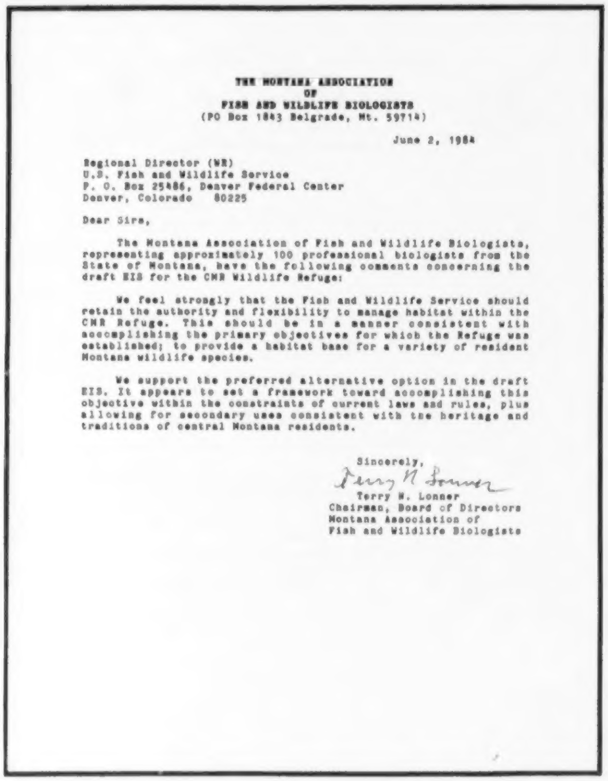
Sincerely,

Robert D. Johnson, President
Miles City Area Chamber of Commerce
PO Box 730
Miles City, Montana 59301

cc: Senator John Melcher
Representative Ron Marlenee
Governor Ted Schwinden

RDJ/ds

Relax in the cattle capital of Montana



THE MONTANA ASSOCIATION
OF
FISH AND WILDLIFE BIOLOGISTS
(PO Box 1843 Belgrade, Mt. 59714)

June 2, 1984

Regional Director (WR)
U.S. Fish and Wildlife Service
P. O. Box 25486, Denver Federal Center
Denver, Colorado 80225

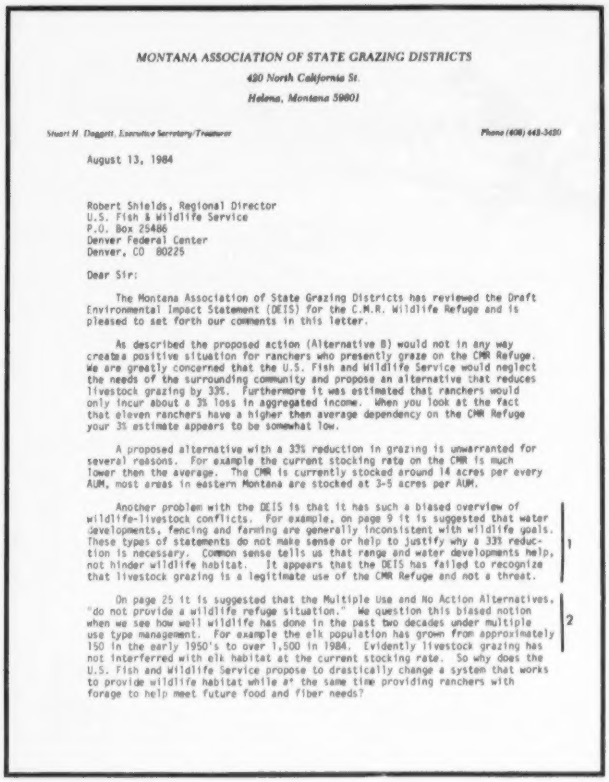
Dear Sirs,

The Montana Association of Fish and Wildlife Biologists, representing approximately 100 professional biologists from the State of Montana, have the following comments concerning the draft EIS for the CMR Wildlife Refuge:

We feel strongly that the Fish and Wildlife Service should retain the authority and flexibility to manage habitat within the CMR Refuge. This should be in a manner consistent with accomplishing the primary objectives for which the Refuge was established; to provide a habitat base for a variety of resident Montana wildlife species.

We support the preferred alternative option in the draft EIS. It appears to set a framework toward accomplishing this objective within the constraints of current laws and rules, plus allowing for secondary uses consistent with the heritage and traditions of central Montana residents.

Sincerely,
Terry N. Lonner
Terry N. Lonner
Chairman, Board of Directors
Montana Association of
Fish and Wildlife Biologists



MONTANA ASSOCIATION OF STATE GRAZING DISTRICTS
420 North California St.
Helena, Montana 59601

Stuart H. Doggett, Executive Secretary/Treasurer *Phone (406) 443-3420*

August 13, 1984

Robert Shields, Regional Director
U.S. Fish & Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, CO 80225

Dear Sir:

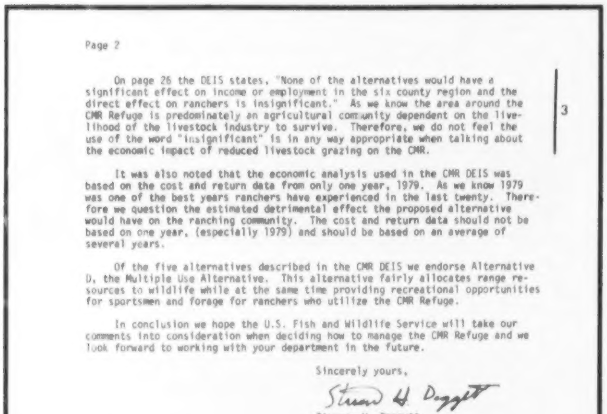
The Montana Association of State Grazing Districts has reviewed the Draft Environmental Impact Statement (DEIS) for the C.M.R. Wildlife Refuge and is pleased to set forth our comments in this letter.

As described the proposed action (Alternative B) would not in any way createa positive situation for ranchers who presently graze on the CMR Refuge. We are greatly concerned that the U.S. Fish and Wildlife Service would neglect the needs of the surrounding community and propose an alternative that reduces livestock grazing by 33%. Furthermore it was estimated that ranchers would only incur about a 3% loss in aggregated income. When you look at the fact that eleven ranchers have a higher then average dependency on the CMR Refuge your 3% estimate appears to be somewhat low.

A proposed alternative with a 33% reduction in grazing is unwarranted for several reasons. For example the current stocking rate on the CMR is much lower then the average. The CMR is currently stocked around 14 acres per every AUM, most areas in eastern Montana are stocked at 3-5 acres per AUM.

Another problem with the DEIS is that it has such a biased overview of wildlife-livestock conflicts. For example, on page 9 it is suggested that water developments, fencing and farming are generally inconsistent with wildlife goals. These types of statements do not make sense or help to justify why a 33% reduction is necessary. Common sense tells us that range and water developments help, not hinder wildlife habitat. It appears that the DEIS has failed to recognize that livestock grazing is a legitimate use of the CMR Refuge and not a threat. 1

On page 25 it is suggested that the Multiple Use and No Action Alternatives, "do not provide a wildlife refuge situation." We question this biased notion when we see how well wildlife has done in the past two decades under multiple use type management. For example the elk population has grown from approximately 150 in the early 1950's to over 1,500 in 1984. Evidently livestock grazing has not interferred with elk habitat at the current stocking rate. So why does the U.S. Fish and Wildlife Service propose to drastically change a system that works to provide wildlife habitat while at the same time providing ranchers with forage to help meet future food and fiber needs? 2



Page 2

On page 26 the DEIS states, "None of the alternatives would have a significant effect on income or employment in the six county region and the direct effect on ranchers is insignificant." As we know the area around the CMR Refuge is predominately an agricultural community dependent on the livelihood of the livestock industry to survive. Therefore, we do not feel the use of the word "insignificant" is in any way appropriate when talking about the economic impact of reduced livestock grazing on the CMR. 3

It was also noted that the economic analysis used in the CMR DEIS was based on the cost and return data from only one year, 1979. As we know 1979 was one of the best years ranchers have experienced in the last twenty. Therefore we question the estimated detrimental effect the proposed alternative would have on the ranching community. The cost and return data should not be based on one year, (especially 1979) and should be based on an average of several years.

Of the five alternatives described in the CMR DEIS we endorse Alternative D, the Multiple Use Alternative. This alternative fairly allocates range resources to wildlife while at the same time providing recreational opportunities for sportsmen and forage for ranchers who utilize the CMR Refuge.

In conclusion we hope the U.S. Fish and Wildlife Service will take our comments into consideration when deciding how to manage the CMR Refuge and we look forward to working with your department in the future.

Sincerely yours,
Stuart H. Doggett
Stuart H. Doggett
Executive Secretary

SHD/meg
cc: Senator Melcher
Senator Baucus
Rep. Marlenee
Ray G. Arnett, Dept. of Interior

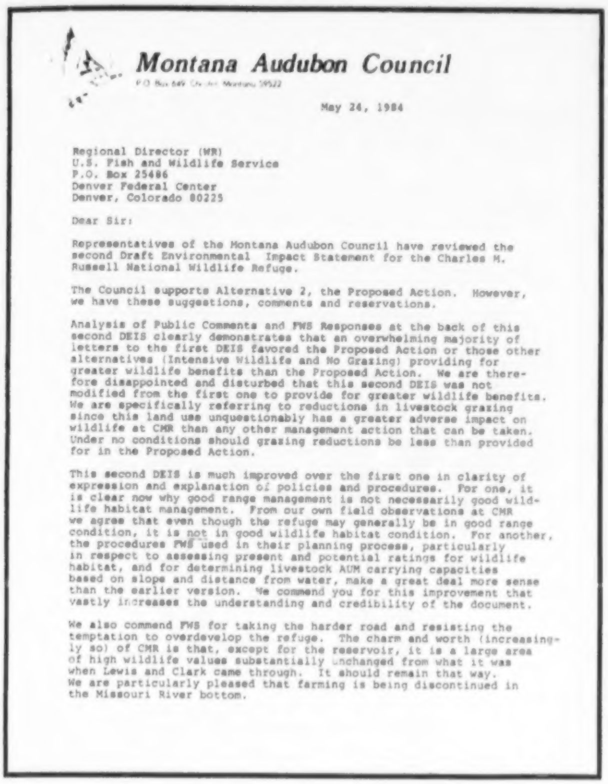
Response to Montana Association of State Grazing Districts

1. The wildlife goals you mention in the No.2 constraint in the middle of page 11 refer to the Mission and Goals for CMR found on page 4 and 5. These call for management "in a generally natural setting," which would discourage such activities as water developments, fencing, and farming, except in special situations. Moreover, additional water developments would distribute livestock into areas of the Refuge that have been reserved for wildlife, thus creating a detrimental impact on wildlife.

   Appendix 14 compares the important habitat conditions for selected wildlife species by the present condition and for the various alternatives.

2. We agree that the elk have increased to about 1,500 animals with the current livestock numbers. But numerous other wildlife species have not fared as well.

3. You have misquoted the text on page 34.



Montana Audubon Council
P.O. Box 649 [illegible] Montana 59522

May 24, 1984

Regional Director (WR)
U.S. Fish and Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Sir:

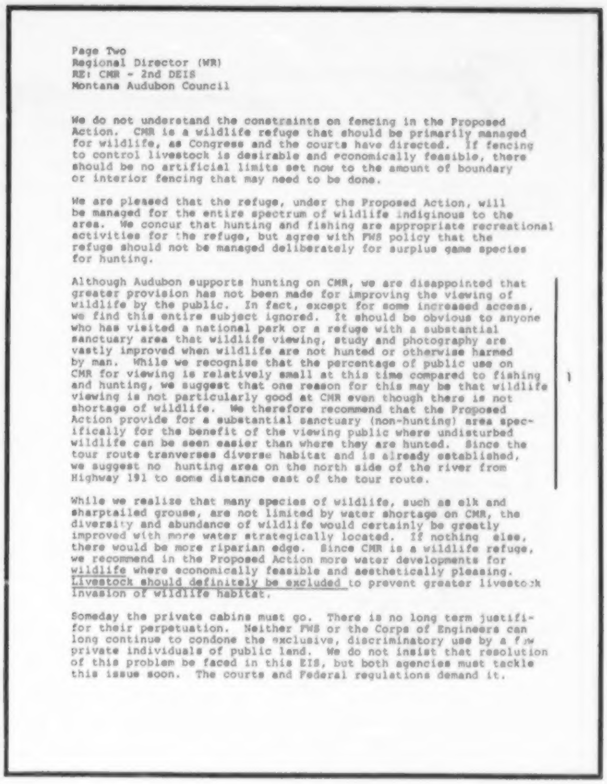
Representatives of the Montana Audubon Council have reviewed the second Draft Environmental Impact Statement for the Charles M. Russell National Wildlife Refuge.

The Council supports Alternative 2, the Proposed Action. However, we have these suggestions, comments and reservations.

Analysis of Public Comments and FWS Responses at the back of this second DEIS clearly demonstrates that an overwhelming majority of letters to the first DEIS favored the Proposed Action or those other alternatives (Intensive Wildlife and No Grazing) providing for greater wildlife benefits than the Proposed Action. We are therefore disappointed and disturbed that this second DEIS was not modified from the first one to provide for greater wildlife benefits. We are specifically referring to reductions in livestock grazing since this land use unquestionably has a greater adverse impact on wildlife at CMR than any other management action that can be taken. Under no conditions should grazing reductions be less than provided for in the Proposed Action.

This second DEIS is much improved over the first one in clarity of expression and explanation of policies and procedures. For one, it is clear now why good range management is not necessarily good wildlife habitat management. From our own field observations at CMR we agree that even though the refuge may generally be in good range condition, it is not in good wildlife habitat condition. For another, the procedures FWS used in their planning process, particularly in respect to assessing present and potential ratings for wildlife habitat, and for determining livestock AUM carrying capacities based on slope and distance from water, make a great deal more sense than the earlier version. We commend you for this improvement that vastly increases the understanding and credibility of the document.

We also commend FWS for taking the harder road and resisting the temptation to overdevelop the refuge. The charm and worth (increasingly so) of CMR is that, except for the reservoir, it is a large area of high wildlife values substantially unchanged from what it was when Lewis and Clark came through. It should remain that way. We are particularly pleased that farming is being discontinued in the Missouri River bottom.



Page Two
Regional Director (WR)
RE: CMR - 2nd DEIS
Montana Audubon Council

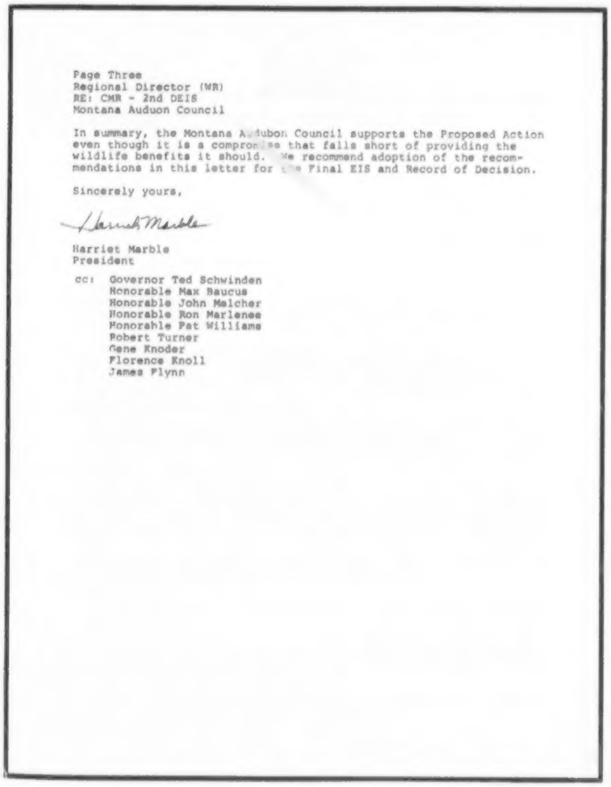
We do not understand the constraints on fencing in the Proposed Action. CMR is a wildlife refuge that should be primarily managed for wildlife, as Congress and the courts have directed. If fencing to control livestock is desirable and economically feasible, there should be no artificial limits set now to the amount of boundary or interior fencing that may need to be done.

We are pleased that the refuge, under the Proposed Action, will be managed for the entire spectrum of wildlife indiginous to the area. We concur that hunting and fishing are appropriate recreational activities for the refuge, but agree with FWS policy that the refuge should not be managed deliberately for surplus game species for hunting.

1 Although Audubon supports hunting on CMR, we are disappointed that greater provision has not been made for improving the viewing of wildlife by the public. In fact, except for some increased access, we find this entire subject ignored. It should be obvious to anyone who has visited a national park or a refuge with a substantial sanctuary area that wildlife viewing, study and photography are vastly improved when wildlife are not hunted or otherwise harmed by man. While we recognize that the percentage of public use on CMR for viewing is relatively small at this time compared to fishing and hunting, we suggest that one reason for this may be that wildlife viewing is not particularly good at CMR even though there is not shortage of wildlife. We therefore recommend that the Proposed Action provide for a substantial sanctuary (non-hunting) area specifically for the benefit of the viewing public where undisturbed wildlife can be seen easier than where they are hunted. Since the tour route tranverses diverse habitat and is already established, we suggest no hunting area on the north side of the river from Highway 191 to some distance east of the tour route.

While we realize that many species of wildlife, such as elk and sharptailed grouse, are not limited by water shortage on CMR, the diversity and abundance of wildlife would certainly be greatly improved with more water strategically located. If nothing else, there would be more riparian edge. Since CMR is a wildlife refuge, we recommend in the Proposed Action more water developments for wildlife where economically feasible and aesthetically pleasing. Livestock should definitely be excluded to prevent greater livestock invasion of wildlife habitat.

Someday the private cabins must go. There is no long term justififor their perpetuation. Neither FWS or the Corps of Engineers can long continue to condone the exclusive, discriminatory use by a few private individuals of public land. We do not insist that resolution of this problem be faced in this EIS, but both agencies must tackle this issue soon. The courts and Federal regulations demand it.



Page Three
Regional Director (WR)
RE: CMR - 2nd DEIS
Montana Auduon Council

In summary, the Montana Audubon Council supports the Proposed Action even though it is a compromise that falls short of providing the wildlife benefits it should. We recommend adoption of the recommendations in this letter for the Final EIS and Record of Decision.

Sincerely yours,

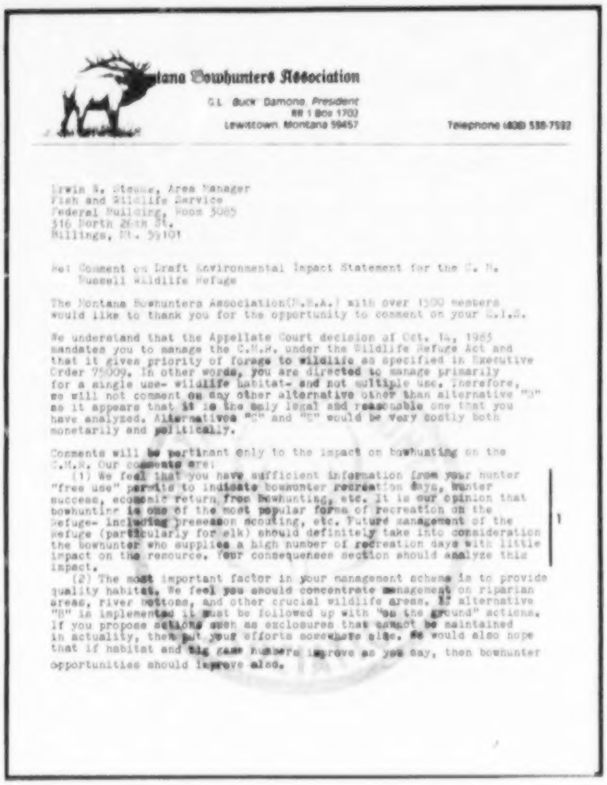
Harriet Marble

Harriet Marble
President

cc: Governor Ted Schwinden
Honorable Max Baucus
Honorable John Melcher
Honorable Ron Marlenee
Honorable Pat Williams
Robert Turner
Gene Knoder
Florence Knoll
James Flynn

Response to Montana Audubon Council

1. The concern of the Montana Audubon Council for improving the viewing of wildlife by the public is not explicitly emphasized in the EIS. However, the subject is covered in the second paragraph on page 15. As stated, opportunities for viewing wildlife will be evaluated during development of the plan for the Slippery Ann area, to be prepared by 1985.



tana Bowhunters Association
G.L. "Buck" Damone, President
RR 1 Box 1702
Lewistown, Montana 59457
Telephone (406) 538-7592

Irwin E. Steuke, Area Manager
Fish and Wildlife Service
Federal Building, Room 3035
316 North 26th St.
Billings, Mt. 59101

Re: Comment on Draft Environmental Impact Statement for the C. M. Russell Wildlife Refuge

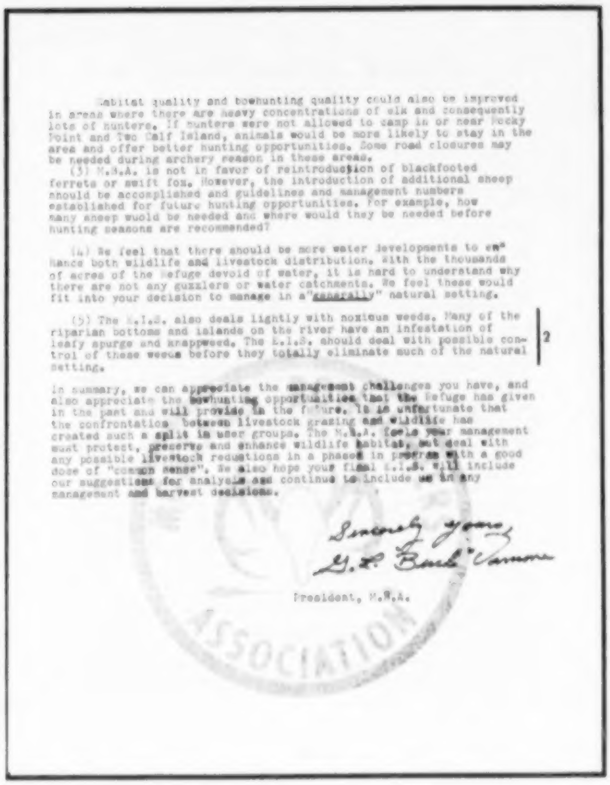
The Montana Bowhunters Association(M.B.A.) with over 1500 members would like to thank you for the opportunity to comment on your E.I.S.

We understand that the Appellate Court decision of Oct. 14, 1983 mandates you to manage the C.M.R. under the Wildlife Refuge Act and that it gives priority of forage to wildlife as specified in Executive Order 75009. In other words, you are directed to manage primarily for a single use- wildlife habitat- and not multiple use. Therefore, we will not comment on any other alternative other than alternative "B" as it appears that it is the only legal and reasonable one that you have analyzed. Alternatives "C" and "E" would be very costly both monetarily and politically.

Comments will be pertinant only to the impact on bowhunting on the C.M.R. Our comments are:

(1) We feel that you have sufficient information from your hunter "free use" permits to indicate bowhunter recreation days, hunter success, economic return from bowhunting, etc. It is our opinion that bowhunting is one of the most popular forms of recreation on the Refuge- including preseason scouting, etc. Future management of the Refuge (particularly for elk) should definitely take into consideration the bowhunter who supplies a high number of recreation days with little impact on the resource. Your consequenses section should analyze this impact. 1

(2) The most important factor in your management scheme is to provide quality habitat. We feel you should concentrate management on riparian areas, river bottoms, and other crucial wildlife areas. If alternative "B" is implemented it must be followed up with "on the ground" actions. If you propose actions such as exclosures that cannot be maintained in actuality, then put your efforts somewhere else. We would also hope that if habitat and big game numbers improve as you say, then bowhunter opportunities should improve also.



Habitat quality and bowhunting quality could also be improved in areas where there are heavy concentrations of elk and consequently lots of hunters. If hunters were not allowed to camp in or near Rocky Point and Two Calf Island, animals would be more likely to stay in the area and offer better hunting opportunities. Some road closures may be needed during archery season in these areas.

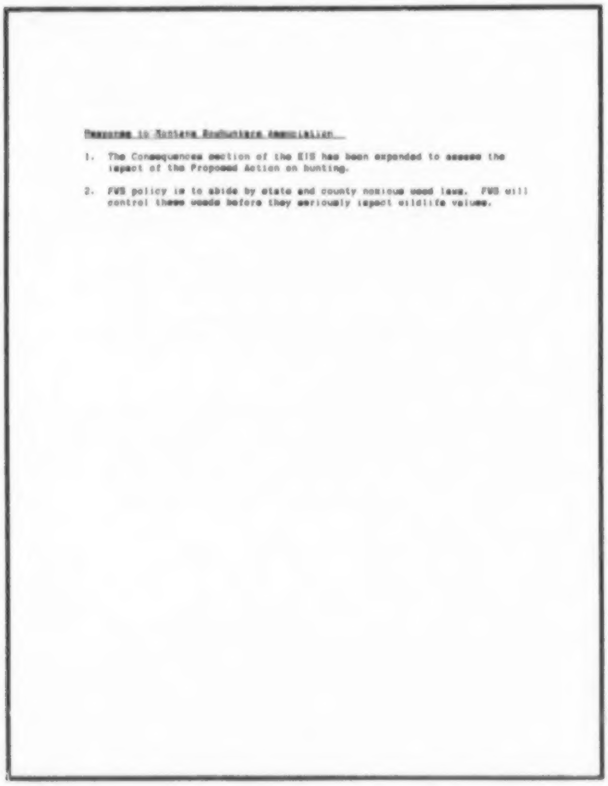
(3) M.B.A. is not in favor of reintroduction of blackfooted ferrets or swift fox. However, the introduction of additional sheep should be accomplished and guidelines and management numbers established for future hunting opportunities. For example, how many sheep would be needed and where would they be needed before hunting seasons are recommended?

(4) We feel that there should be more water developments to enhance both wildlife and livestock distribution. With the thousands of acres of the Refuge devoid of water, it is hard to understand why there are not any guzzlers or water catchments. We feel these would fit into your decision to manage in a "generally" natural setting.

(5) The E.I.S. also deals lightly with noxious weeds. Many of the riparian bottoms and islands on the river have an infestation of leafy spurge and knappweed. The E.I.S. should deal with possible control of these weeds before they totally eliminate much of the natural setting. 2

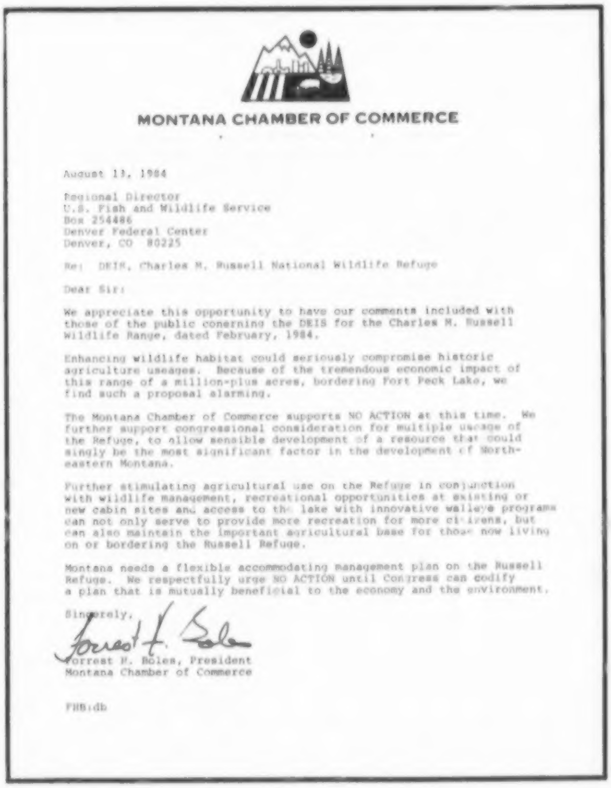
In summary, we can appreciate the management challenges you have, and also appreciate the bowhunting opportunities that the Refuge has given in the past and will provide in the future. It is unfortunate that the confrontation between livestock grazing and wildlife has created such a split in user groups. The M.B.A. feels your management must protect, preserve and enhance wildlife habitat, but deal with any possible livestock reductions in a phased in program with a good dose of "common sense". We also hope your final E.I.S. will include our suggestions for analysis and continue to include us in any management and harvest decisions.

Sincerely yours,
G.L. "Buck" Damone
President, M.B.A.



Response to Montana Bowhunters Association

1. The Consequences section of the EIS has been expanded to assess the impact of the Proposed Action on hunting.
2. FWS policy is to abide by state and county noxious weed laws. FWS will control these weeds before they seriously impact wildlife values.



MONTANA CHAMBER OF COMMERCE

August 13, 1984

Regional Director
U.S. Fish and Wildlife Service
Box 254486
Denver Federal Center
Denver, CO 80225

Re: DEIS, Charles M. Russell National Wildlife Refuge

Dear Sir:

We appreciate this opportunity to have our comments included with those of the public conerning the DEIS for the Charles M. Russell Wildlife Range, dated February, 1984.

Enhancing wildlife habitat could seriously compromise historic agriculture useages. Because of the tremendous economic impact of this range of a million-plus acres, bordering Fort Peck Lake, we find such a proposal alarming.

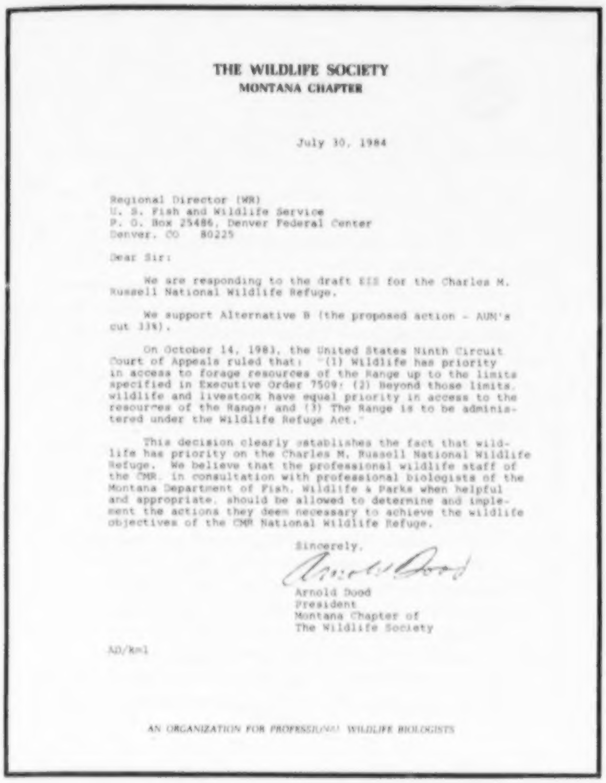
The Montana Chamber of Commerce supports NO ACTION at this time. We further support congressional consideration for multiple usage of the Refuge, to allow sensible development of a resource that could singly be the most significant factor in the development of Northeastern Montana.

Further stimulating agricultural use on the Refuge in conjunction with wildlife management, recreational opportunities at existing or new cabin sites and access to the lake with innovative walleye programs can not only serve to provide more recreation for more citizens, but can also maintain the important agricultural base for those now living on or bordering the Russell Refuge.

Montana needs a flexible accommodating management plan on the Russell Refuge. We respectfully urge NO ACTION until Congress can codify a plan that is mutually beneficial to the economy and the environment.

Sincerely,
Forrest H. Boles
Forrest H. Boles, President
Montana Chamber of Commerce

FHB:db



THE WILDLIFE SOCIETY
MONTANA CHAPTER

July 30, 1984

Regional Director (WR)
U. S. Fish and Wildlife Service
P. O. Box 25486, Denver Federal Center
Denver, CO 80225

Dear Sir:

We are responding to the draft EIS for the Charles M. Russell National Wildlife Refuge.

We support Alternative B (the proposed action - AUM's cut 33%).

On October 14, 1983, the United States Ninth Circuit Court of Appeals ruled that: "(1) Wildlife has priority in access to forage resources of the Range up to the limits specified in Executive Order 7509; (2) Beyond those limits, wildlife and livestock have equal priority in access to the resources of the Range; and (3) The Range is to be administered under the Wildlife Refuge Act."

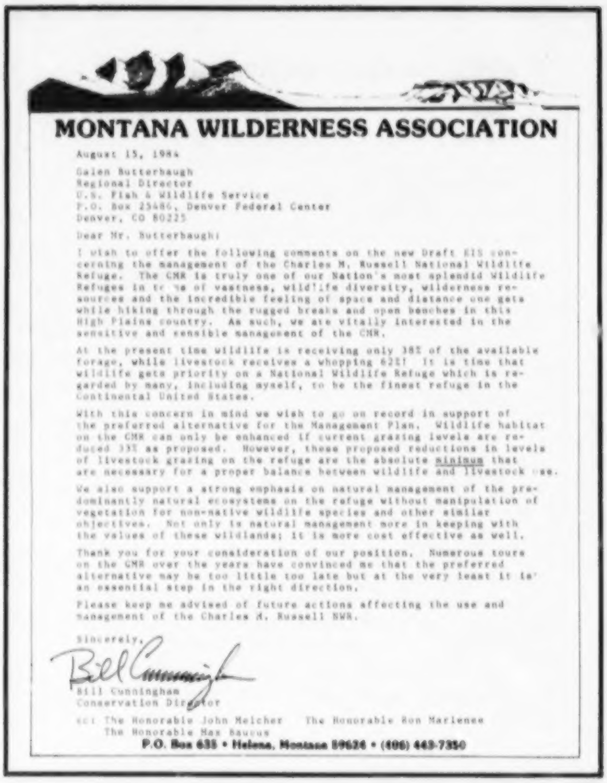
This decision clearly establishes the fact that wildlife has priority on the Charles M. Russell National Wildlife Refuge. We believe that the professional wildlife staff of the CMR, in consultation with professional biologists of the Montana Department of Fish, Wildlife & Parks when helpful and appropriate, should be allowed to determine and implement the actions they deem necessary to achieve the wildlife objectives of the CMR National Wildlife Refuge.

Sincerely,

Arnold Dood
President
Montana Chapter of
The Wildlife Society

AD/kml

AN ORGANIZATION FOR PROFESSIONAL WILDLIFE BIOLOGISTS



MONTANA WILDERNESS ASSOCIATION

August 15, 1984

Galen Butterbaugh
Regional Director
U.S. Fish & Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, CO 80225

Dear Mr. Butterbaugh:

I wish to offer the following comments on the new Draft EIS concerning the management of the Charles M. Russell National Wildlife Refuge. The CMR is truly one of our Nation's most splendid Wildlife Refuges in terms of vastness, wildlife diversity, wilderness resources and the incredible feeling of space and distance one gets while hiking through the rugged breaks and open benches in this High Plains country. As such, we are vitally interested in the sensitive and sensible management of the CMR.

At the present time wildlife is receiving only 38% of the available forage, while livestock receives a whopping 62%! It is time that wildlife gets priority on a National Wildlife Refuge which is regarded by many, including myself, to be the finest refuge in the Continental United States.

With this concern in mind we wish to go on record in support of the preferred alternative for the Management Plan. Wildlife habitat on the CMR can only be enhanced if current grazing levels are reduced 33% as proposed. However, these proposed reductions in levels of livestock grazing on the refuge are the absolute minimum that are necessary for a proper balance between wildlife and livestock use.

We also support a strong emphasis on natural management of the predominantly natural ecosystems on the refuge without manipulation of vegetation for non-native wildlife species and other similar objectives. Not only is natural management more in keeping with the values of these wildlands; it is more cost effective as well.

Thank you for your consideration of our position. Numerous tours on the CMR over the years have convinced me that the preferred alternative may be too little too late but at the very least it is an essential step in the right direction.

Please keep me advised of future actions affecting the use and management of the Charles M. Russell NWR.

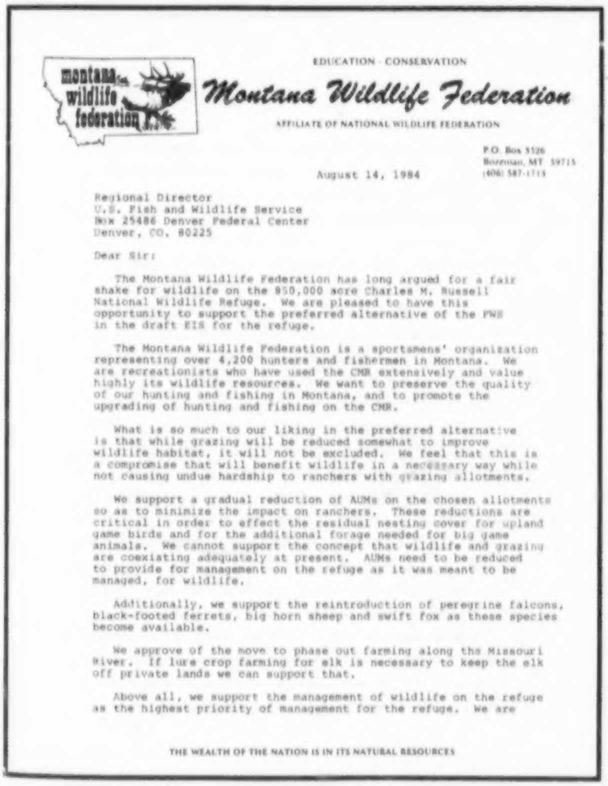
Sincerely,

Bill Cunningham

Bill Cunningham
Conservation Director

cc: The Honorable John Melcher The Honorable Ron Marlenee
    The Honorable Max Baucus

P.O. Box 635 • Helena, Montana 59624 • (406) 443-7350



EDUCATION · CONSERVATION
Montana Wildlife Federation
AFFILIATE OF NATIONAL WILDLIFE FEDERATION

P.O. Box 3526
Bozeman, MT 59715
(406) 587-1713

August 14, 1984

Regional Director
U.S. Fish and Wildlife Service
Box 25486 Denver Federal Center
Denver, CO. 80225

Dear Sir:

The Montana Wildlife Federation has long argued for a fair shake for wildlife on the 850,000 acre Charles M. Russell National Wildlife Refuge. We are pleased to have this opportunity to support the preferred alternative of the FWS in the draft EIS for the refuge.

The Montana Wildlife Federation is a sportsmens' organization representing over 4,200 hunters and fishermen in Montana. We are recreationists who have used the CMR extensively and value highly its wildlife resources. We want to preserve the quality of our hunting and fishing in Montana, and to promote the upgrading of hunting and fishing on the CMR.

What is so much to our liking in the preferred alternative is that while grazing will be reduced somewhat to improve wildlife habitat, it will not be excluded. We feel that this is a compromise that will benefit wildlife in a necessary way while not causing undue hardship to ranchers with grazing allotments.

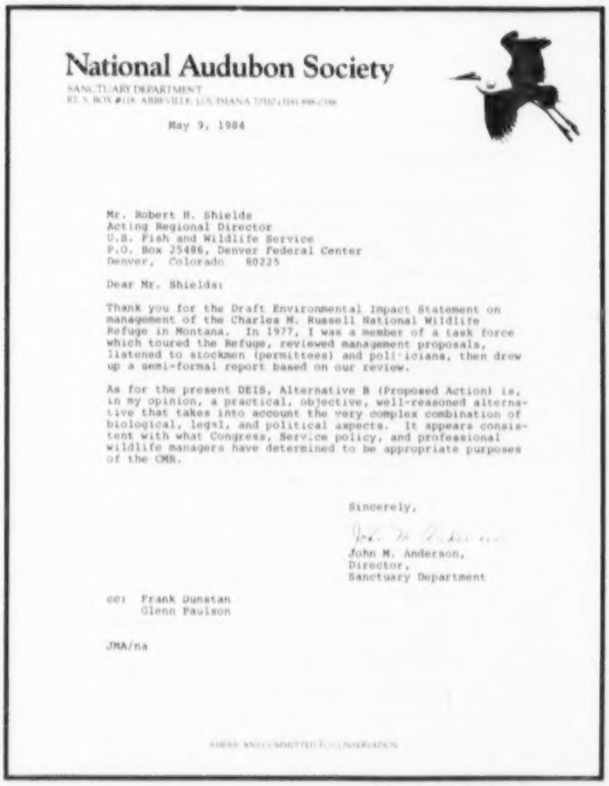
We support a gradual reduction of AUMs on the chosen allotments so as to minimize the impact on ranchers. These reductions are critical in order to effect the residual nesting cover for upland game birds and for the additional forage needed for big game animals. We cannot support the concept that wildlife and grazing are coexisting adequately at present. AUMs need to be reduced to provide for management on the refuge as it was meant to be managed, for wildlife.

Additionally, we support the reintroduction of peregrine falcons, black-footed ferrets, big horn sheep and swift fox as these species become available.

We approve of the move to phase out farming along the Missouri River. If lure crop farming for elk is necessary to keep the elk off private lands we can support that.

Above all, we support the management of wildlife on the refuge as the highest priority of management for the refuge. We are

THE WEALTH OF THE NATION IS IN ITS NATURAL RESOURCES



National Audubon Society
SANCTUARY DEPARTMENT
RT. 5, BOX #118, ABBEVILLE, LOUISIANA [illegible]

May 9, 1984

Mr. Robert H. Shields
Acting Regional Director
U.S. Fish and Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, Colorado 80225

Dear Mr. Shields:

Thank you for the Draft Environmental Impact Statement on management of the Charles M. Russell National Wildlife Refuge in Montana. In 1977, I was a member of a task force which toured the Refuge, reviewed management proposals, listened to stockmen (permittees) and politicians, then drew up a semi-formal report based on our review.

As for the present DEIS, Alternative B (Proposed Action) is, in my opinion, a practical, objective, well-reasoned alternative that takes into account the very complex combination of biological, legal, and political aspects. It appears consistent with what Congress, Service policy, and professional wildlife managers have determined to be appropriate purposes of the CMR.

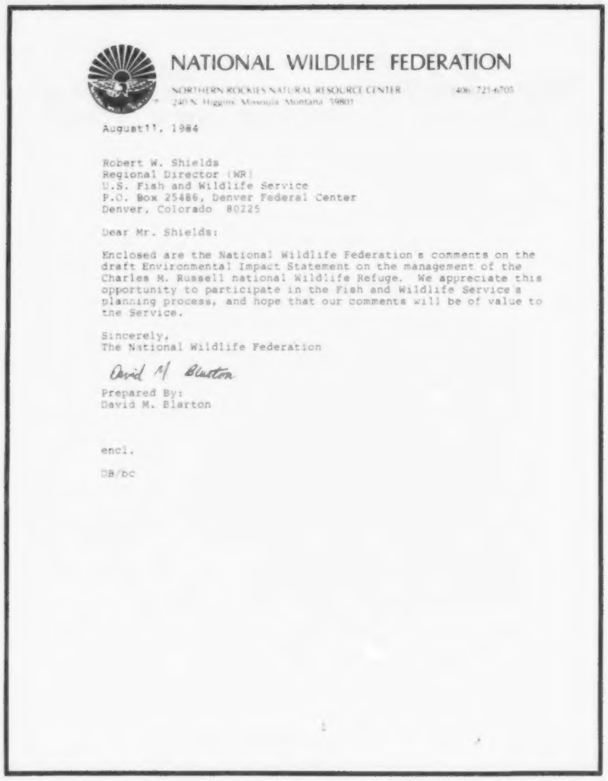
Sincerely,

John M. Anderson,
Director,
Sanctuary Department

cc: Frank Dunstan
    Glenn Paulson

JMA/na

[illegible] AND COMMITTED TO CONSERVATION



NATIONAL WILDLIFE FEDERATION
NORTHERN ROCKIES NATURAL RESOURCE CENTER (406) 721-6705
240 N. Higgins Missoula Montana 59801

August11, 1984

Robert W. Shields
Regional Director (WR)
U.S. Fish and Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, Colorado 80225

Dear Mr. Shields:

Enclosed are the National Wildlife Federation's comments on the draft Environmental Impact Statement on the management of the Charles M. Russell national Wildlife Refuge. We appreciate this opportunity to participate in the Fish and Wildlife Service's planning process, and hope that our comments will be of value to the Service.

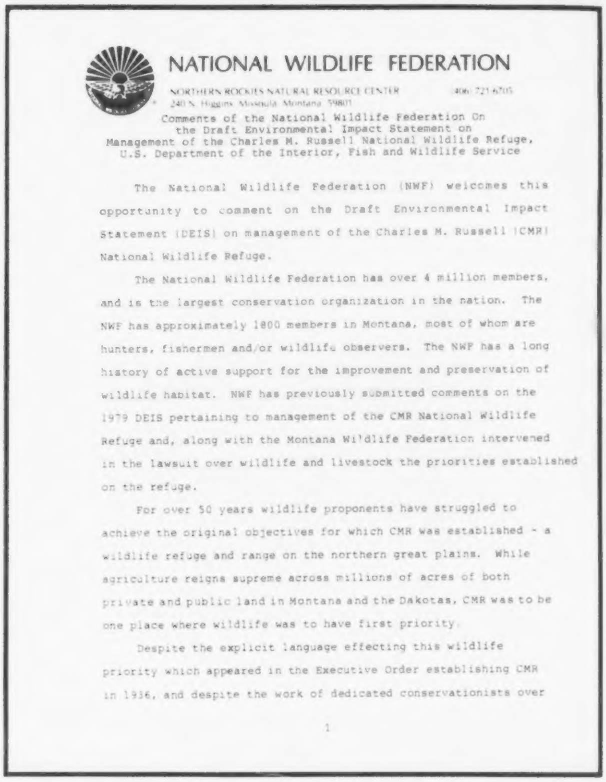
Sincerely,
The National Wildlife Federation

David M Blarton

Prepared By:
David M. Blarton

encl.

DB/bc



NATIONAL WILDLIFE FEDERATION
NORTHERN ROCKIES NATURAL RESOURCE CENTER (406) 721-6705
240 N. Higgins Missoula Montana 59801

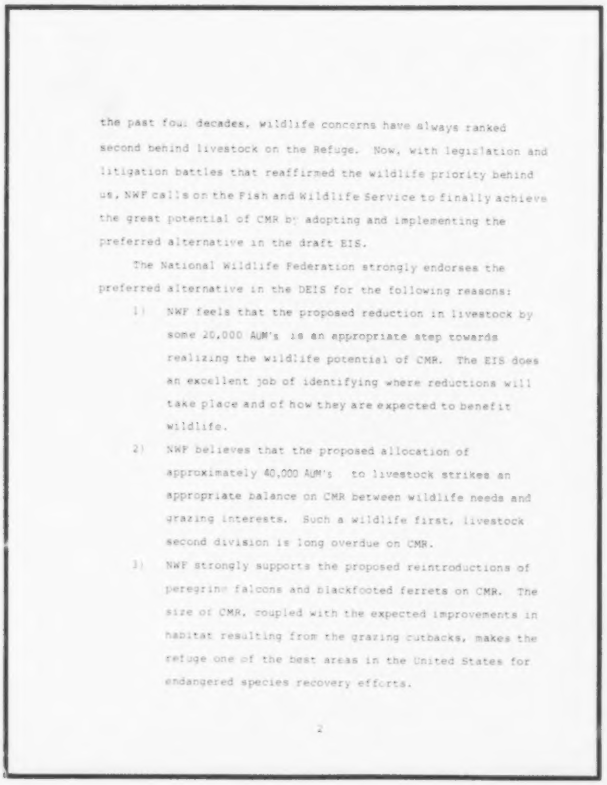
Comments of the National Wildlife Federation On the Draft Environmental Impact Statement on Management of the Charles M. Russell National Wildlife Refuge, U.S. Department of the Interior, Fish and Wildlife Service

The National Wildlife Federation (NWF) welcomes this opportunity to comment on the Draft Environmental Impact Statement (DEIS) on management of the Charles M. Russell (CMR) National Wildlife Refuge.

The National Wildlife Federation has over 4 million members, and is the largest conservation organization in the nation. The NWF has approximately 1800 members in Montana, most of whom are hunters, fishermen and/or wildlife observers. The NWF has a long history of active support for the improvement and preservation of wildlife habitat. NWF has previously submitted comments on the 1979 DEIS pertaining to management of the CMR National Wildlife Refuge and, along with the Montana Wildlife Federation intervened in the lawsuit over wildlife and livestock the priorities established on the refuge.

For over 50 years wildlife proponents have struggled to achieve the original objectives for which CMR was established - a wildlife refuge and range on the northern great plains. While agriculture reigns supreme across millions of acres of both private and public land in Montana and the Dakotas, CMR was to be one place where wildlife was to have first priority.

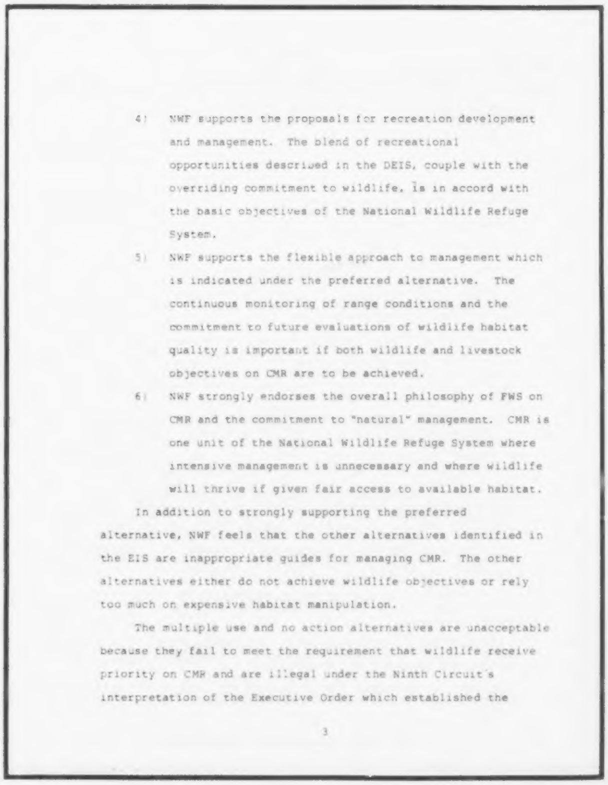
Despite the explicit language effecting this wildlife priority which appeared in the Executive Order establishing CMR in 1936, and despite the work of dedicated conservationists over



the past four decades, wildlife concerns have always ranked second behind livestock on the Refuge. Now, with legislation and litigation battles that reaffirmed the wildlife priority behind us, NWF calls on the Fish and Wildlife Service to finally achieve the great potential of CMR by adopting and implementing the preferred alternative in the draft EIS.

The National Wildlife Federation strongly endorses the preferred alternative in the DEIS for the following reasons:

1) NWF feels that the proposed reduction in livestock by some 20,000 AUM's is an appropriate step towards realizing the wildlife potential of CMR. The EIS does an excellent job of identifying where reductions will take place and of how they are expected to benefit wildlife.
2) NWF believes that the proposed allocation of approximately 40,000 AUM's to livestock strikes an appropriate balance on CMR between wildlife needs and grazing interests. Such a wildlife first, livestock second division is long overdue on CMR.
3) NWF strongly supports the proposed reintroductions of peregrine falcons and blackfooted ferrets on CMR. The size of CMR, coupled with the expected improvements in habitat resulting from the grazing cutbacks, makes the refuge one of the best areas in the United States for endangered species recovery efforts.



4) NWF supports the proposals for recreation development and management. The blend of recreational opportunities described in the DEIS, couple with the overriding commitment to wildlife, is in accord with the basic objectives of the National Wildlife Refuge System.
5) NWF supports the flexible approach to management which is indicated under the preferred alternative. The continuous monitoring of range conditions and the commitment to future evaluations of wildlife habitat quality is important if both wildlife and livestock objectives on CMR are to be achieved.
6) NWF strongly endorses the overall philosophy of FWS on CMR and the commitment to "natural" management. CMR is one unit of the National Wildlife Refuge System where intensive management is unnecessary and where wildlife will thrive if given fair access to available habitat.

In addition to strongly supporting the preferred alternative, NWF feels that the other alternatives identified in the EIS are inappropriate guides for managing CMR. The other alternatives either do not achieve wildlife objectives or rely too much on expensive habitat manipulation.

The multiple use and no action alternatives are unacceptable because they fail to meet the requirement that wildlife receive priority on CMR and are illegal under the Ninth Circuit's interpretation of the Executive Order which established the refuge. Schwenke v. Secretary of the Interior, 720 F2d. 571 (9th Cir. 1983). The intensive wildlife management alternative, while perhaps desirable from a strictly wildlife perspective, is unrealistic given likely budget levels for the refuge system and inappropriate for a remote refuge such as CMR where natural systems can be expected to function well.

While NWF supports the preferred alternative, at least two management prescriptions described therein warrant further attention from FWS. First, a better description of proposed ripping activities should be included in the final EIS, and additional protection for Riparian areas should be considered.

The DEIS suggests the ripping of all suitable panspots be employed to improve watershed quality and to reduce soil erosion. This action is specifically mentioned as a range management tool under the Intensive Wildlife Management Alternative, and it is not clear whether soil ripping would be used as a range management tool under the Proposed Alternative. While the improvement of watershed quality is desirable, automatically ripping all panspots is not necessarily desirable. First, soil 1
ripping certainly destroys the naturalness of the habitat. Secondly, panspots may provide some benefit to wildlife, such as providing strutting grounds for grouse. The final EIS should explore and discuss in some detail the good and bad aspects of ripping panspots, and should specify the circumstances in which soil ripping will be employed.

As noted on page 42 of the DEIS, the riparian habitat is the most important and productive wildlife habitat of the CMR National Wildlife Refuge. Page 16 however, notes that riparian areas have traditionally been viewed as sacrifice areas due to concentrations of livestock that inevitably occur from grazing operations. The DEIS seems to indicate that riparian areas will remain sacrifice areas and little discussion addresses this important issue.

Because riparian areas are very important to wildlife, the 2
final EIS should discuss the grazing impact upon riparian areas in detail. Alternatives should fully explore the possible solutions to alleviating the problem. Fencing has been mentioned as one solution but no other solution has been offered. Since the availability of water is the crux of the problem, alternatives should explore the potential for developing alternative water sources for livestock. It is not satisfactory to assume that there is not a solution to the problem, and label riparian areas as sacrifice areas.

Summary

The NWF commends the Fish and Wildlife service on its efforts to preserve and enhance the wildlife values of the CMR National Wildlife Refuge. The NWF was especially impressed with the way the DEIS explained the evaluation criteria for range and wildlife conditions (Appendices 2 and 8), and the way the DEIS specified the fire management plan with regard to different environments (page 11). The detail provided in those two

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instances was excellent, and the NWF hopes the final EIS will employ similar detail with regard to the issues raised by NWF's comments.

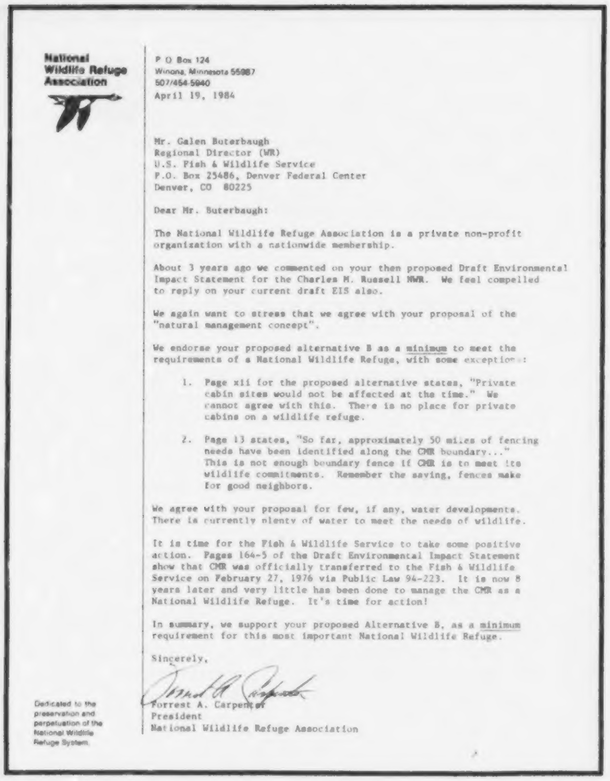
The NWF feels that the Fish and Wildlife Service has prepared an adequate DEIS, and urges the Fish and Wildlife Service to expedite the process of implementing the Proposed Alternative or a modified version of the Intensive Wildlife Management Alternative. The management of the CMR National Wildlife Refuge has been in limbo since 1976. Until a new management scheme is implemented, it is probable that the wildlife habitat of the refuge will continue to deteriorate. Therefore, it is imperative that the EIS process proceed without further delay so that implementation of a new management scheme may begin as soon as possible. A final EIS which reflects the comments submitted in response to the DEIS should be rapidly developed and issued along with a Record of Decision selecting either the Proposed Alternative or a modified version of the Intensive Wildlife Management Alternative as the alternative to be implemented.

Response to National Wildlife Federation

1. **Ripping would not be employed under the Proposed Action. It is judged as not consistent with the wildlife goals, especially the CMR Mission Statement (page 4).**

2. **Your concern for riparian habitat is well founded. It is a key to wildlife abundance on CMR, and riparian areas are extremely sensitive to grazing. The literature, short of eliminating grazing, is not particularly helpful. The level of detail you suggest for the FEIS is, in our view, beyond the scope of this document. Based on what can be gleaned from the literature and from experience at CMR, FWS proposes a number of actions designed to allow recovery of much of the riparian habitat while still permitting light grazing that will accomplish other desirable wildlife habitat improvements.**

   As explained in the presentation of the Proposed Action and in the Consequences of grazing and other practices on riparian areas in the Proposed Action, a number of measures would be taken to afford protection to this vital habitat. Grazing would be reduced and seasons of use modified [illegible] take pressure off of these areas. Key riparian areas and shrub communities would be fenced. As per your suggestion, alternative sources for stock watering would be sought so that valuable riparian areas could be fenced without denying livestock water. Prescribed burning and shrub plantings would also stimulate and initiate riparian communities. As the mitigating measures in the FEIS emphasize, should the proposed measures not be enough and still not allow riparian habitat to recover and expand, further steps would be taken. Very importantly, riparian areas would be closely monitored to make sure that they were responding satisfactorily.



National Wildlife Refuge Association

P O Box 124
Winona, Minnesota 55987
507/454-5940

April 19, 1984

Mr. Galen Buterbaugh
Regional Director (WR)
U.S. Fish & Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, CO 80225

Dear Mr. Buterbaugh:

The National Wildlife Refuge Association is a private non-profit organization with a nationwide membership.

About 3 years ago we commented on your then proposed Draft Environmental Impact Statement for the Charles M. Russell NWR. We feel compelled to reply on your current draft EIS also.

We again want to stress that we agree with your proposal of the "natural management concept".

We endorse your proposed alternative B as a minimum to meet the requirements of a National Wildlife Refuge, with some exceptions:

1. Page xii for the proposed alternative states, "Private cabin sites would not be affected at the time." We cannot agree with this. There is no place for private cabins on a wildlife refuge.
2. Page 13 states, "So far, approximately 50 miles of fencing needs have been identified along the CMR boundary..." This is not enough boundary fence if CMR is to meet its wildlife commitments. Remember the saying, fences make for good neighbors.

We agree with your proposal for few, if any, water developments. There is currently plenty of water to meet the needs of wildlife.

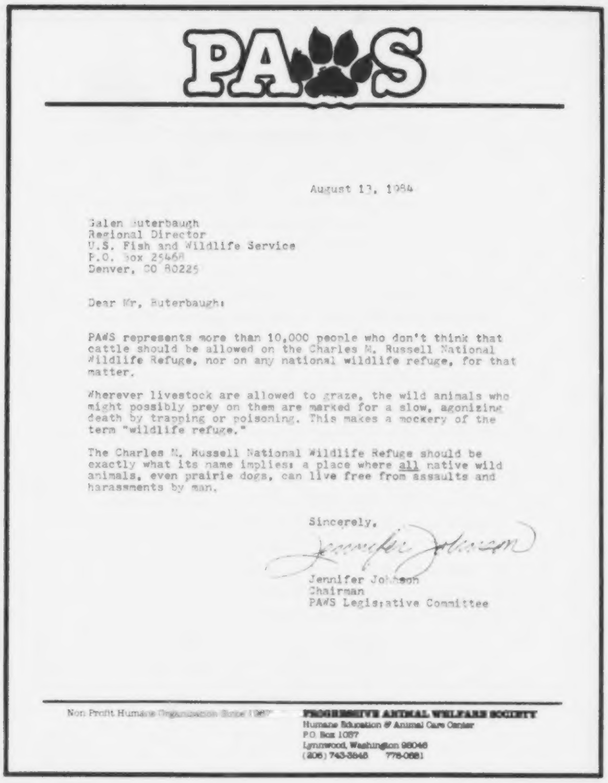
It is time for the Fish & Wildlife Service to take some positive action. Pages 164-5 of the Draft Environmental Impact Statement show that CMR was officially transferred to the Fish & Wildlife Service on February 27, 1976 via Public Law 94-223. It is now 8 years later and very little has been done to manage the CMR as a National Wildlife Refuge. It's time for action!

In summary, we support your proposed Alternative B, as a minimum requirement for this most important National Wildlife Refuge.

Sincerely,

Forrest A. Carpenter
President
National Wildlife Refuge Association

Dedicated to the preservation and perpetuation of the National Wildlife Refuge System.



PAWS

August 13, 1984

Galen Buterbaugh
Regional Director
U.S. Fish and Wildlife Service
P.O. Box 25468
Denver, CO 80225

Dear Mr, Buterbaugh:

PAWS represents more than 10,000 people who don't think that cattle should be allowed on the Charles M. Russell National Wildlife Refuge, nor on any national wildlife refuge, for that matter.

Wherever livestock are allowed to graze, the wild animals who might possibly prey on them are marked for a slow, agonizing death by trapping or poisoning. This makes a mockery of the term "wildlife refuge."

The Charles M. Russell National Wildlife Refuge should be exactly what its name implies: a place where all native wild animals, even prairie dogs, can live free from assaults and harassments by man.

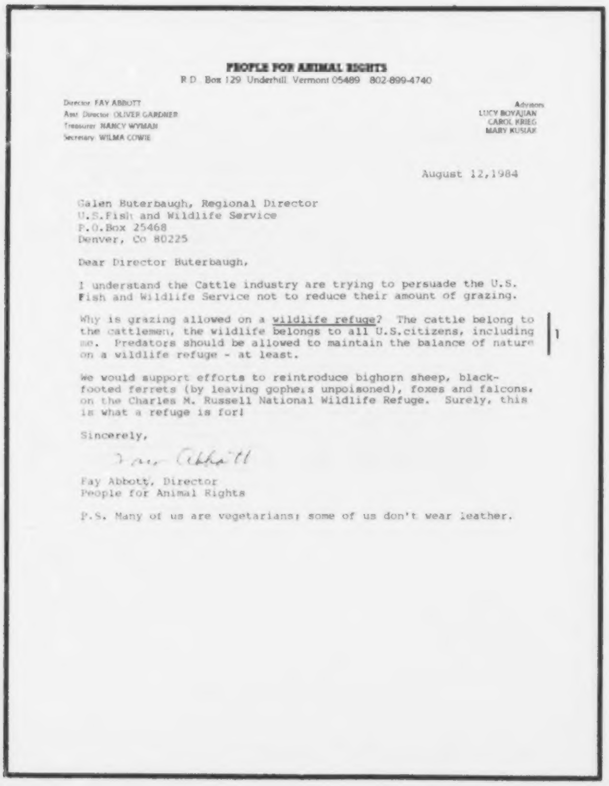
Sincerely,

Jennifer Johnson

Jennifer Johnson
Chairman
PAWS Legislative Committee

Non Profit Humane Organization Since 1967

PROGRESSIVE ANIMAL WELFARE SOCIETY
Humane Education & Animal Care Center
P.O. Box 1037
Lynnwood, Washington 98046
(206) 743-3845 778-0881



PEOPLE FOR ANIMAL RIGHTS
R.D. Box 129 Underhill, Vermont 05489 802-899-4740

Director FAY ABBOTT
Asst. Director OLIVER GARDNER
Treasurer NANCY WYMAN
Secretary WILMA COWIE

Advisors
LUCY BOYAJIAN
CAROL KRIEG
MARY KUSIAK

August 12,1984

Galen Buterbaugh, Regional Director
U.S.Fish and Wildlife Service
P.O.Box 25468
Denver, Co 80225

Dear Director Buterbaugh,

I understand the Cattle industry are trying to persuade the U.S. Fish and Wildlife Service not to reduce their amount of grazing.

Why is grazing allowed on a wildlife refuge? The cattle belong to the cattlemen, the wildlife belongs to all U.S.citizens, including me. Predators should be allowed to maintain the balance of nature on a wildlife refuge - at least. 1

We would support efforts to reintroduce bighorn sheep, black-footed ferrets (by leaving gophers unpoisoned), foxes and falcons. on the Charles M. Russell National Wildlife Refuge. Surely, this is what a refuge is for!

Sincerely,

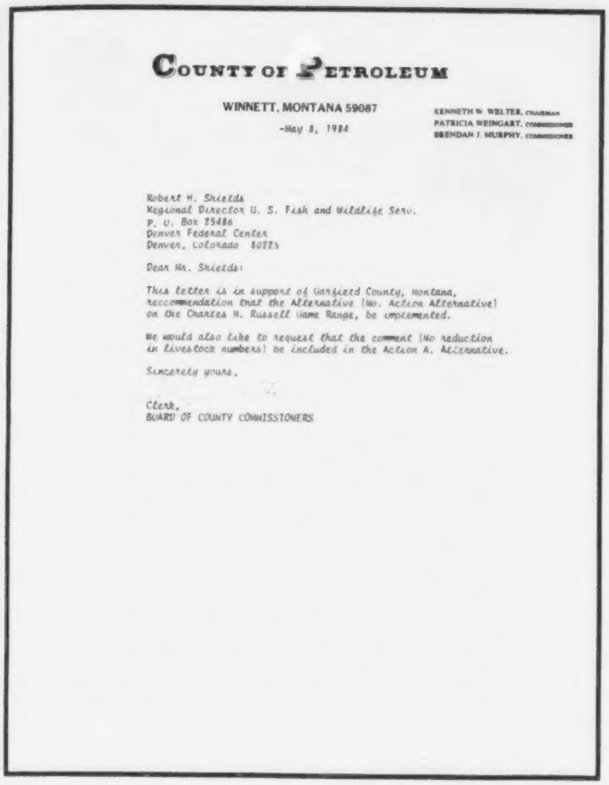
Fay Abbott

Fay Abbott, Director
People for Animal Rights

P.S. Many of us are vegetarians; some of us don't wear leather.

Response to People for Animal Rights

1. The establishing authority for the Charles M. Russell National Wildlife Refuge, Executive Order 7509, signed by President Franklin Roosevelt in 1936, requires forage in excess of specified wildlife needs be available for domestic livestock. Executive Order 7509 has not been rescinded or changed.



COUNTY OF PETROLEUM

WINNETT, MONTANA 59087

KENNETH W. WELTER, CHAIRMAN
PATRICIA WEINGART, COMMISSIONER
BRENDAN J. MURPHY, COMMISSIONER

-May 8, 1984

Robert H. Shields
Regional Director U. S. Fish and Wildlife Serv.
P. O. Box 25486
Denver Federal Center
Denver, Colorado 80225

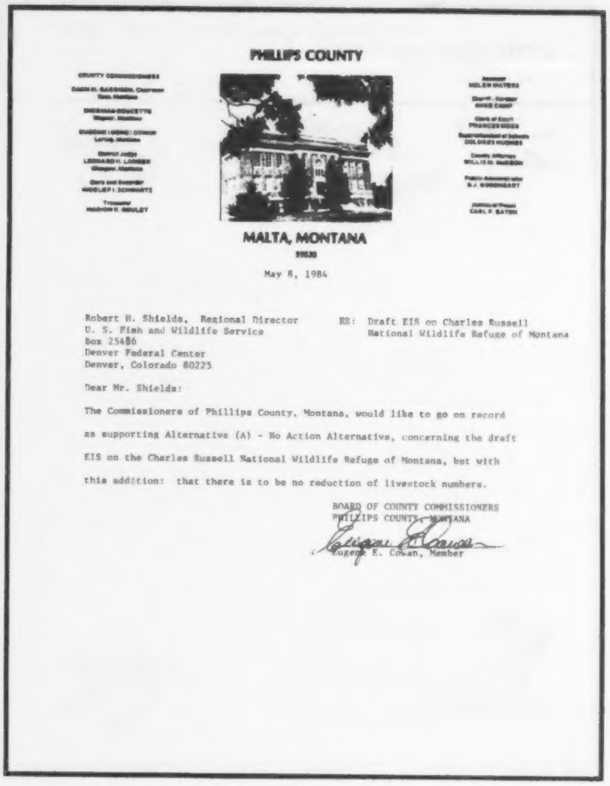
Dear Mr. Shields:

This letter is in support of Garfield County, Montana, reccommendation that the Alternative (No. Action Alternative) on the Charles M. Russell Game Range, be implemented.

We would also like to request that the comment (No reduction in livestock numbers) be included in the Action A. Alternative.

Sincerely yours,

Clerk,
BOARD OF COUNTY COMMISSIONERS



PHILLIPS COUNTY

MALTA, MONTANA

May 8, 1984

Robert H. Shields, Regional Director
U. S. Fish and Wildlife Service
Box 25486
Denver Federal Center
Denver, Colorado 80225

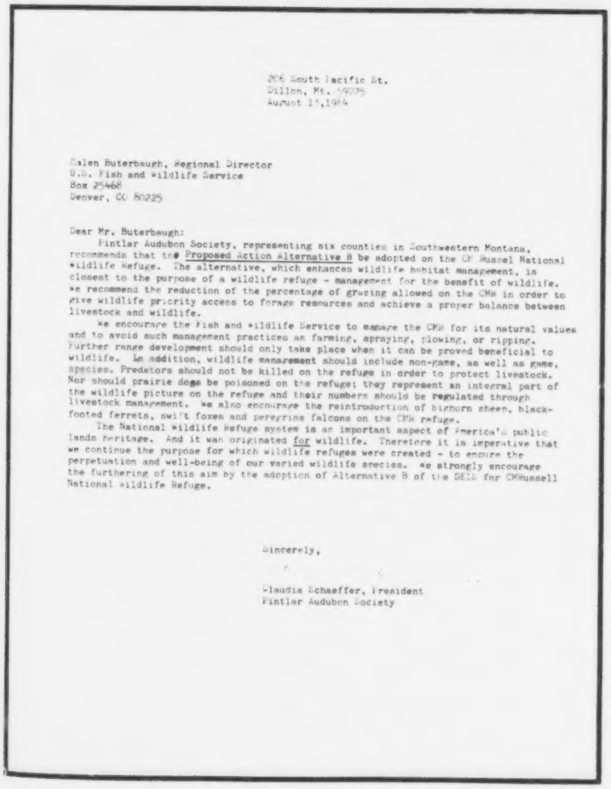
RE: Draft EIS on Charles Russell
National Wildlife Refuge of Montana

Dear Mr. Shields:

The Commissioners of Phillips County, Montana, would like to go on record as supporting Alternative (A) - No Action Alternative, concerning the draft EIS on the Charles Russell National Wildlife Refuge of Montana, but with this addition: that there is to be no reduction of livestock numbers.

BOARD OF COUNTY COMMISSIONERS
PHILLIPS COUNTY, MONTANA

Eugene E. Cowan
Eugene E. Cowan, Member



206 South Pacific St.
Dillon, Mt. 59725
August 1,1984

Galen Buterbaugh, Regional Director
U.S. Fish and Wildlife Service
Box 25468
Denver, CO 80225

Dear Mr. Buterbaugh:

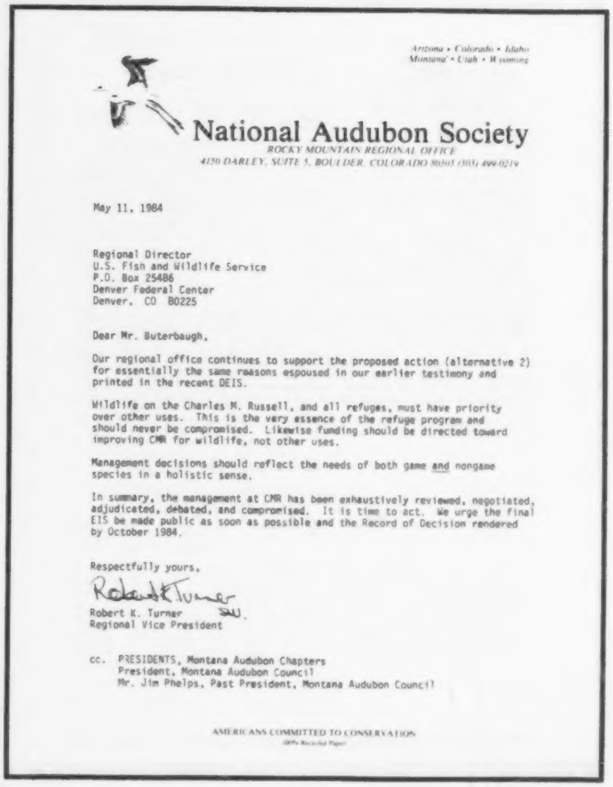
Pintlar Audubon Society, representing six counties in Southwestern Montana, recommends that the Proposed Action Alternative B be adopted on the CM Russel National Wildlife Refuge. The alternative, which enhances wildlife habitat management, is closest to the purpose of a wildlife refuge - management for the benefit of wildlife. We recommend the reduction of the percentage of grazing allowed on the CMR in order to give wildlife priority access to forage resources and achieve a proper balance between livestock and wildlife.

We encourage the Fish and Wildlife Service to manage the CMR for its natural values and to avoid such management practices as farming, spraying, plowing, or ripping. Further range development should only take place when it can be proved beneficial to wildlife. In addition, wildlife management should include non-game, as well as game, species. Predators should not be killed on the refuge in order to protect livestock. Nor should prairie dogs be poisoned on the refuge; they represent an integral part of the wildlife picture on the refuge and their numbers should be regulated through livestock management. We also encourage the reintroduction of bighorn sheep, black-footed ferrets, swift foxes and peregrine falcons on the CMR refuge.

The National Wildlife Refuge system is an important aspect of America's public lands heritage. And it was originated for wildlife. Therefore it is imperative that we continue the purpose for which wildlife refuges were created - to ensure the perpetuation and well-being of our varied wildlife species. We strongly encourage the furthering of this aim by the adoption of Alternative B of the DEIS for CMRussell National Wildlife Refuge.

Sincerely,

Claudia Schaeffer, President
Pintlar Audubon Society



Arizona • Colorado • Idaho
Montana • Utah • Wyoming

National Audubon Society
ROCKY MOUNTAIN REGIONAL OFFICE
4150 DARLEY, SUITE 5, BOULDER, COLORADO 80303 (303) 499-0219

May 11, 1984

Regional Director
U.S. Fish and Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, CO 80225

Dear Mr. Buterbaugh,

Our regional office continues to support the proposed action (alternative 2) for essentially the same reasons espoused in our earlier testimony and printed in the recent DEIS.

Wildlife on the Charles M. Russell, and all refuges, must have priority over other uses. This is the very essence of the refuge program and should never be compromised. Likewise funding should be directed toward improving CMR for wildlife, not other uses.

Management decisions should reflect the needs of both game and nongame species in a holistic sense.

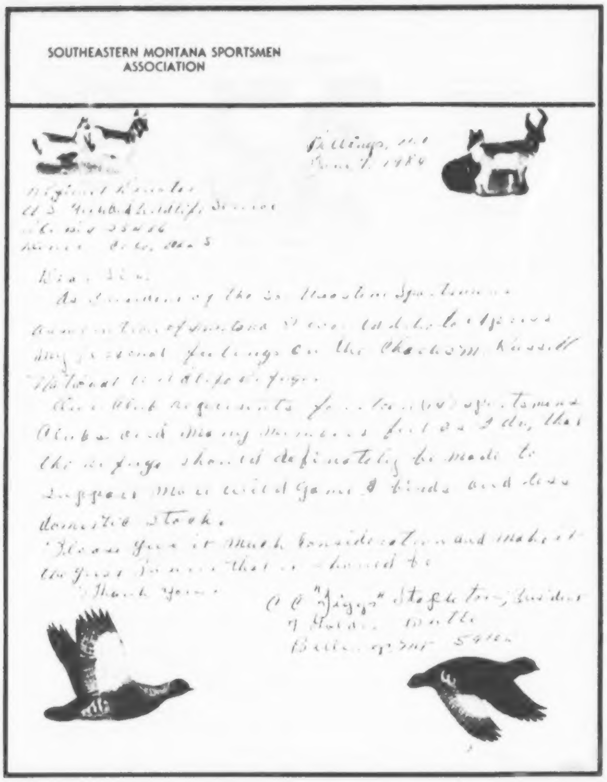
In summary, the management at CMR has been exhaustively reviewed, negotiated, adjudicated, debated, and compromised. It is time to act. We urge the final EIS be made public as soon as possible and the Record of Decision rendered by October 1984.

Respectfully yours,

Robert K. Turner
Robert K. Turner
Regional Vice President

cc. PRESIDENTS, Montana Audubon Chapters
President, Montana Audubon Council
Mr. Jim Phelps, Past President, Montana Audubon Council

AMERICANS COMMITTED TO CONSERVATION



SOUTHEASTERN MONTANA SPORTSMEN
ASSOCIATION

Billings, Mt
June 7, 1984

Regional Director
U.S. Fish & Wildlife Service
P.O. Box 25486
Denver, Colo. 80225

Dear Sir:

As President of the Southeastern Sportsmens Association of Montana I wish to let you know my personal feelings on the Charles M. Russell National Wildlife Refuge.

As I also represent four (4) sportsmans clubs and many members feel as I do, that the refuge should definitely be made to support more wild game & birds and less domestic stock.

Please give it much consideration and make it the great home that it should be.

Thank you.

C.C. "Ziggy" Stapleton, President
7 [illegible]
Billings, Mt 59102

SQUARE BUTTE GRAZING ASSOCIATION
Malta Montana 59538

August 12, 1984

To: Regional Director (WR)
U. S. Fish and Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver Colorado 80225

From: Russell Lafond, Secretary
Square Butte Grazing Association
Gibson Route
Big Timber, Montana 59011

SUBJECT: C.M.R. ENVIRONMENTAL IMPACT STATEMENT:

We, and our rancher neighbors, are the people most directly affected by changes in the CMR and we ask that our opinions be given careful consideration by the FWS for the following reasons:

- We have direct involvement because of cattle grazing.
- We have concern for the economics of our communities.
- Our concern with protecting and preserving the 'environment goes way beyond the recreational aspect. Our 'bread and butter' depends on a producing environment over the long term. We, too, are recreational users of the CMR.
- We are professionals in the propogation and management of ranges and livestock and among our groups are ranchers that have lived in the Missouri Breaks for more than half a century. Their expertise on this area is invaluable. They have 'adjusted' to, and learned from, every contingency the 'environment' provided.

Our comments on the EIS proposals are:

- Proposal A seems unattractive to wildlife and recreational interests but it could include the improvements included in the other proposals.
- Proposal B seems very attractive to the general public and appears to be a nice compromise for the livestock interests. However, in the 1980 ETS range experts, wildlife experts, and livestock experts virtually agreed (unanimously) that cuts in livestock did not mean that there would be an increase in wildlife. This proposal appears to be a CUT LIVESTOCK PLAN but not necessarily an IMPROVE WILDLIFE PLAN.
- Proposal D is the best longterm plan for the general public. Wildlife numbers and habitat can be improved, livestock habitat can be improved, and recreational facilities can be improved. Quote from page 3 by the FWS, "Although habitat requirements are different for various species on CMR, habitat deficiences for many can be corrected by fulfilling requirements of sharp-tail grouse, mule deer, and pronghorns." Deer, antelope, and grouse can be found outside of CMR in vast profusion right along with the livestock. It seems, therefore, that the habitat for wildlife and livestock must be similar and the range condition must be a close approximation of the needs of wildlife. The outside range condition probably would not score as high as the CMR so why is there so much wildlife outside of the CMR?

Page 2 - CMR- EIS from Square Butte Grazing Assoc.

- Page 222. Mackie, 1978, reported: "Very few studies have been attempted in which more than a few of the possible effects and processes of competition and grazing impacts have been considered. Most measure only short term effects. More importantly, few studies have ever attempted to compare behavior and performance of wild ungulate populations between similar grazed and ungrazed ranges." EIS does not cite evidence that cuts will improve habitat. Literature cited deals with short term preference of wildlife responding to greater cover when grazing is light. It does not answer the question about the longterm effects of light grazing on wildlife and range. Also, the FWS does not consider winter feeding of deer and elk, but that doesn't mean that no-one feeds them. Their natural winter habitat becomes alfalfa hay stacks. Fences do not prevent the mobility of the kinds of animals on the CMR and the topography does not lend itself to practical fencing. Another point on mobility, a survey by the Montana Dept. of Fish and Game in 1979 concluded that the wildlife on CMR spent 65% of its time on private land. It would appear that it is not practical to maintain herds of migratory livestock ON the CMR. 1
- Instead of an arbitrary experiment of cutting livestock numbers (over a 20 year period) a better experiment would be to use various grazing systems practical to each individual terrain. For example, it is reported that short-duration high-intensity grazing can have great benefits in highly eroded areas such as cut coulees and stream banks.

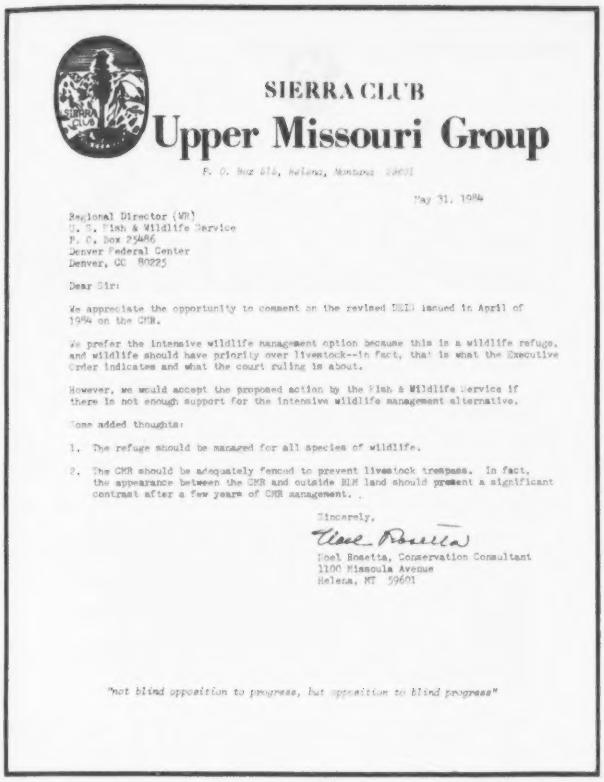
If additional information is desired we shall be glad to respond to your questions.

Respectfully submitted,

Russell Lafond
Secretary, S.B.G.A.

Response to Square Butte Grazing Association

1. The basis for livestock reductions and general adoption of light, seasonal livestock grazing to improve wildlife habitat is found in the discussion of Consequences of the Proposed Action, the References, and Appendices 2, 15, and 16. The FWS believes the evidence is overwhelming that adoption of these measures in the Proposed Action will improve wildlife habitat and enable FWS to achieve the wildlife objectives for CMR.



SIERRA CLUB
Upper Missouri Group
P. O. Box 618, Helena, Montana 59601

May 31, 1984

Regional Director (WR)
U. S. Fish & Wildlife Service
P. O. Box 25486
Denver Federal Center
Denver, CO 80225

Dear Sir:

We appreciate the opportunity to comment on the revised DEIS issued in April of 1984 on the CMR.

We prefer the intensive wildlife management option because this is a wildlife refuge, and wildlife should have priority over livestock--in fact, that is what the Executive Order indicates and what the court ruling is about.

However, we would accept the proposed action by the Fish & Wildlife Service if there is not enough support for the intensive wildlife management alternative.

Some added thoughts:

1. The refuge should be managed for all species of wildlife.

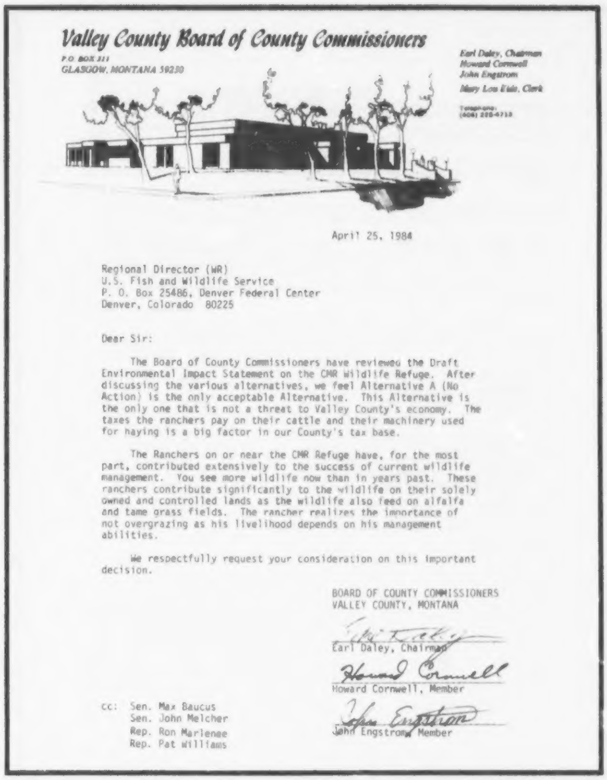
2. The CMR should be adequately fenced to prevent livestock trespass. In fact, the appearance between the CMR and outside BLM land should present a significant contrast after a few years of CMR management.

Sincerely,

Noel Rosetta

Noel Rosetta, Conservation Consultant
1100 Missoula Avenue
Helena, MT 59601

"not blind opposition to progress, but opposition to blind progress"



Valley County Board of County Commissioners
P.O. BOX 311
GLASGOW, MONTANA 59230

Earl Daley, Chairman
Howard Cornwell
John Engstrom
Mary Lou Eide, Clerk

Telephone:
(406) 228-4713

April 25, 1984

Regional Director (WR)
U.S. Fish and Wildlife Service
P. O. Box 25486, Denver Federal Center
Denver, Colorado 80225

Dear Sir:

The Board of County Commissioners have reviewed the Draft Environmental Impact Statement on the CMR Wildlife Refuge. After discussing the various alternatives, we feel Alternative A (No Action) is the only acceptable Alternative. This Alternative is the only one that is not a threat to Valley County's economy. The taxes the ranchers pay on their cattle and their machinery used for haying is a big factor in our County's tax base.

The Ranchers on or near the CMR Refuge have, for the most part, contributed extensively to the success of current wildlife management. You see more wildlife now than in years past. These ranchers contribute significantly to the wildlife on their solely owned and controlled lands as the wildlife also feed on alfalfa and tame grass fields. The rancher realizes the importance of not overgrazing as his livelihood depends on his management abilities.

We respectfully request your consideration on this important decision.

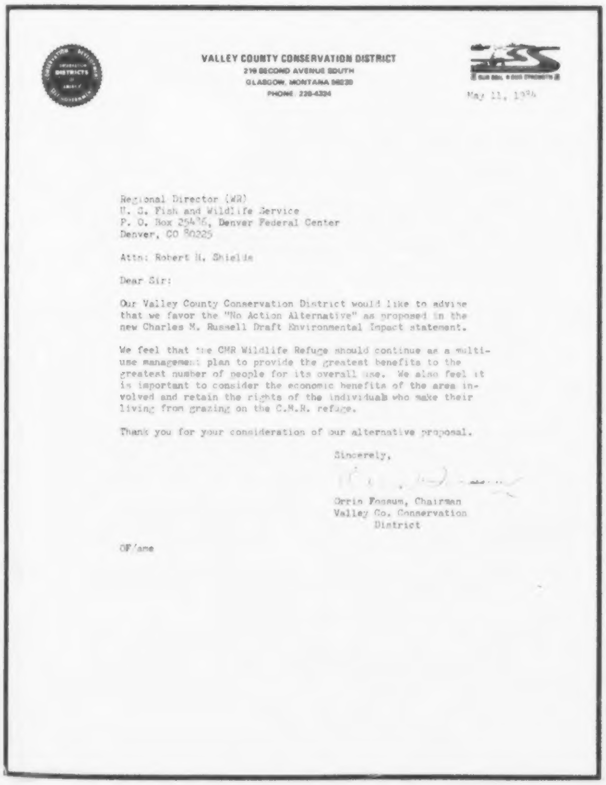
BOARD OF COUNTY COMMISSIONERS
VALLEY COUNTY, MONTANA

Earl Daley, Chairman

Howard Cornwell
Howard Cornwell, Member

John Engstrom
John Engstrom, Member

cc: Sen. Max Baucus
Sen. John Melcher
Rep. Ron Marlenee
Rep. Pat Williams



VALLEY COUNTY CONSERVATION DISTRICT
219 SECOND AVENUE SOUTH
GLASGOW, MONTANA 59230
PHONE 228-4324

May 11, 1984

Regional Director (WR)
U. S. Fish and Wildlife Service
P. O. Box 25486, Denver Federal Center
Denver, CO 80225

Attn: Robert H. Shields

Dear Sir:

Our Valley County Conservation District would like to advise that we favor the "No Action Alternative" as proposed in the new Charles M. Russell Draft Environmental Impact statement.

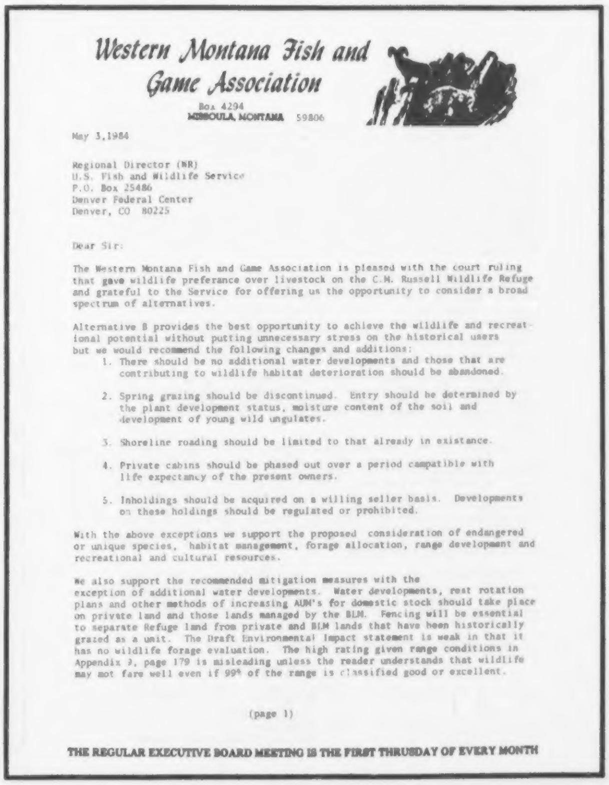
We feel that the CMR Wildlife Refuge should continue as a multi-use management plan to provide the greatest benefits to the greatest number of people for its overall use. We also feel it is important to consider the economic benefits of the area involved and retain the rights of the individuals who make their living from grazing on the C.M.R. refuge.

Thank you for your consideration of our alternative proposal.

Sincerely,

Orrin Fossum, Chairman
Valley Co. Conservation
District

OF/ame



Western Montana Fish and Game Association
Box 4294
MISSOULA, MONTANA 59806

May 3,1984

Regional Director (WR)
U.S. Fish and Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, CO 80225

Dear Sir:

The Western Montana Fish and Game Association is pleased with the court ruling that gave wildlife preferance over livestock on the C.M. Russell Wildlife Refuge and grateful to the Service for offering us the opportunity to consider a broad spectrum of alternatives.

Alternative B provides the best opportunity to achieve the wildlife and recreational potential without putting unnecessary stress on the historical users but we would recommend the following changes and additions:

1. There should be no additional water developments and those that are contributing to wildlife habitat deterioration should be abandoned.

2. Spring grazing should be discontinued. Entry should be determined by the plant development status, moisture content of the soil and development of young wild ungulates.

3. Shoreline roading should be limited to that already in existance.

4. Private cabins should be phased out over a period campatible with life expectancy of the present owners.

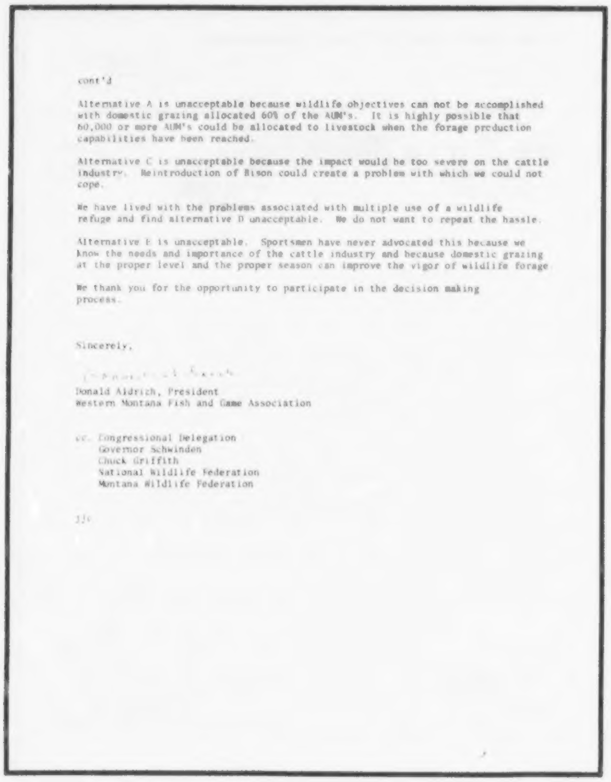
5. Inholdings should be acquired on a willing seller basis. Developments on these holdings should be regulated or prohibited.

With the above exceptions we support the proposed consideration of endangered or unique species, habitat management, forage allocation, range development and recreational and cultural resources.

We also support the recommended mitigation measures with the exception of additional water developments. Water developments, rest rotation plans and other methods of increasing AUM's for domestic stock should take place on private land and those lands managed by the BLM. Fencing will be essential to separate Refuge land from private and BLM lands that have been historically grazed as a unit. The Draft Environmental Impact statement is weak in that it has no wildlife forage evaluation. The high rating given range conditions in Appendix 9, page 179 is misleading unless the reader understands that wildlife may not fare well even if 99% of the range is classified good or excellent.

(page 1)

THE REGULAR EXECUTIVE BOARD MEETING IS THE FIRST THRUSDAY OF EVERY MONTH



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Alternative A is unacceptable because wildlife objectives can not be accomplished with domestic grazing allocated 60% of the AUM's. It is highly possible that 60,000 or more AUM's could be allocated to livestock when the forage production capabilities have been reached.

Alternative C is unacceptable because the impact would be too severe on the cattle industry. Reintroduction of Bison could create a problem with which we could not cope.

We have lived with the problems associated with multiple use of a wildlife refuge and find alternative D unacceptable. We do not want to repeat the hassle.

Alternative E is unacceptable. Sportsmen have never advocated this because we know the needs and importance of the cattle industry and because domestic grazing at the proper level and the proper season can improve the vigor of wildlife forage

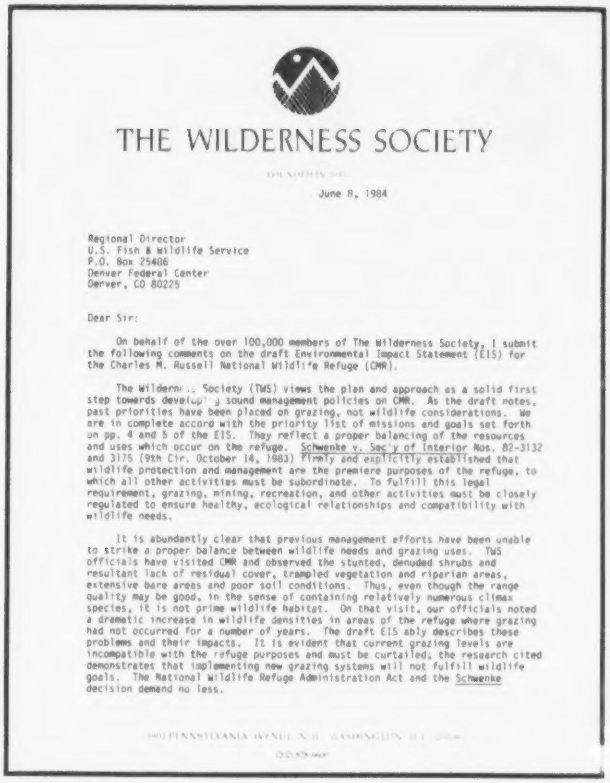
We thank you for the opportunity to participate in the decision making process.

Sincerely,

Donald Aldrich, President
Western Montana Fish and Game Association

cc. Congressional Delegation
    Governor Schwinden
    Chuck Griffith
    National Wildlife Federation
    Montana Wildlife Federation

jjc



THE WILDERNESS SOCIETY

FOUNDED IN 1935

June 8, 1984

Regional Director
U.S. Fish & Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, CO 80225

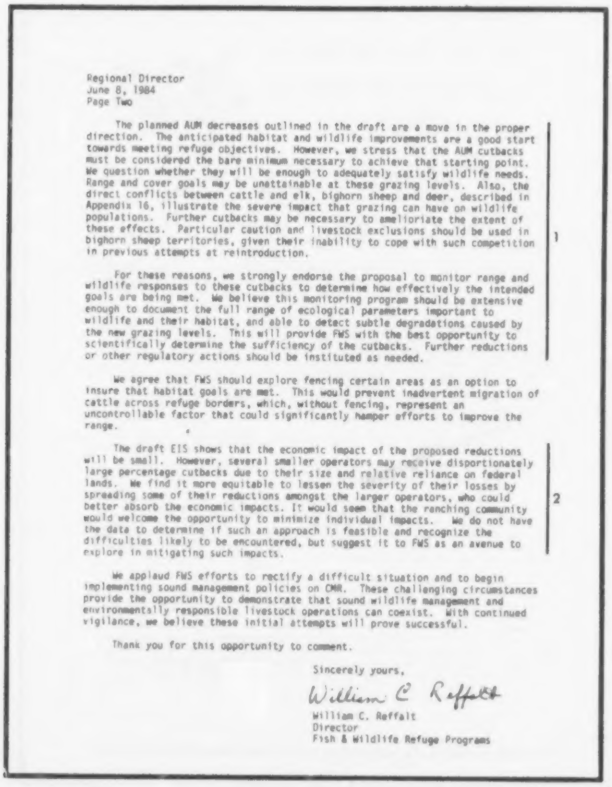
Dear Sir:

On behalf of the over 100,000 members of The Wilderness Society, I submit the following comments on the draft Environmental Impact Statement (EIS) for the Charles M. Russell National Wildlife Refuge (CMR).

The Wilderness Society (TWS) views the plan and approach as a solid first step towards developing sound management policies on CMR. As the draft notes, past priorities have been placed on grazing, not wildlife considerations. We are in complete accord with the priority list of missions and goals set forth on pp. 4 and 5 of the EIS. They reflect a proper balancing of the resources and uses which occur on the refuge. Schwenke v. Sec'y of Interior Nos. 82-3132 and 3175 (9th Cir. October 14, 1983) firmly and explicitly established that wildlife protection and management are the premiere purposes of the refuge, to which all other activities must be subordinate. To fulfill this legal requirement, grazing, mining, recreation, and other activities must be closely regulated to ensure healthy, ecological relationships and compatibility with wildlife needs.

It is abundantly clear that previous management efforts have been unable to strike a proper balance between wildlife needs and grazing uses. TWS officials have visited CMR and observed the stunted, denuded shrubs and resultant lack of residual cover, trampled vegetation and riparian areas, extensive bare areas and poor soil conditions. Thus, even though the range quality may be good, in the sense of containing relatively numerous climax species, it is not prime wildlife habitat. On that visit, our officials noted a dramatic increase in wildlife densities in areas of the refuge where grazing had not occurred for a number of years. The draft EIS ably describes these problems and their impacts. It is evident that current grazing levels are incompatible with the refuge purposes and must be curtailed; the research cited demonstrates that implementing new grazing systems will not fulfill wildlife goals. The National Wildlife Refuge Administration Act and the Schwenke decision demand no less.

1901 PENNSYLVANIA AVENUE, N.W., WASHINGTON, D.C. 20006
(202) 828-6600



Regional Director
June 8, 1984
Page Two

The planned AUM decreases outlined in the draft are a move in the proper direction. The anticipated habitat and wildlife improvements are a good start towards meeting refuge objectives. However, we stress that the AUM cutbacks must be considered the bare minimum necessary to achieve that starting point. We question whether they will be enough to adequately satisfy wildlife needs. Range and cover goals may be unattainable at these grazing levels. Also, the direct conflicts between cattle and elk, bighorn sheep and deer, described in Appendix 16, illustrate the severe impact that grazing can have on wildlife populations. Further cutbacks may be necessary to ameliorate the extent of these effects. Particular caution and livestock exclusions should be used in bighorn sheep territories, given their inability to cope with such competition in previous attempts at reintroduction. 1

For these reasons, we strongly endorse the proposal to monitor range and wildlife responses to these cutbacks to determine how effectively the intended goals are being met. We believe this monitoring program should be extensive enough to document the full range of ecological parameters important to wildlife and their habitat, and able to detect subtle degradations caused by the new grazing levels. This will provide FWS with the best opportunity to scientifically determine the sufficiency of the cutbacks. Further reductions or other regulatory actions should be instituted as needed.

We agree that FWS should explore fencing certain areas as an option to insure that habitat goals are met. This would prevent inadvertent migration of cattle across refuge borders, which, without fencing, represent an uncontrollable factor that could significantly hamper efforts to improve the range.

The draft EIS shows that the economic impact of the proposed reductions will be small. However, several smaller operators may receive disportionately large percentage cutbacks due to their size and relative reliance on federal lands. We find it more equitable to lessen the severity of their losses by spreading some of their reductions amongst the larger operators, who could better absorb the economic impacts. It would seem that the ranching community would welcome the opportunity to minimize individual impacts. We do not have the data to determine if such an approach is feasible and recognize the difficulties likely to be encountered, but suggest it to FWS as an avenue to explore in mitigating such impacts. 2

We applaud FWS efforts to rectify a difficult situation and to begin implementing sound management policies on CMR. These challenging circumstances provide the opportunity to demonstrate that sound wildlife management and environmentally responsible livestock operations can coexist. With continued vigilance, we believe these initial attempts will prove successful.

Thank you for this opportunity to comment.

Sincerely yours,

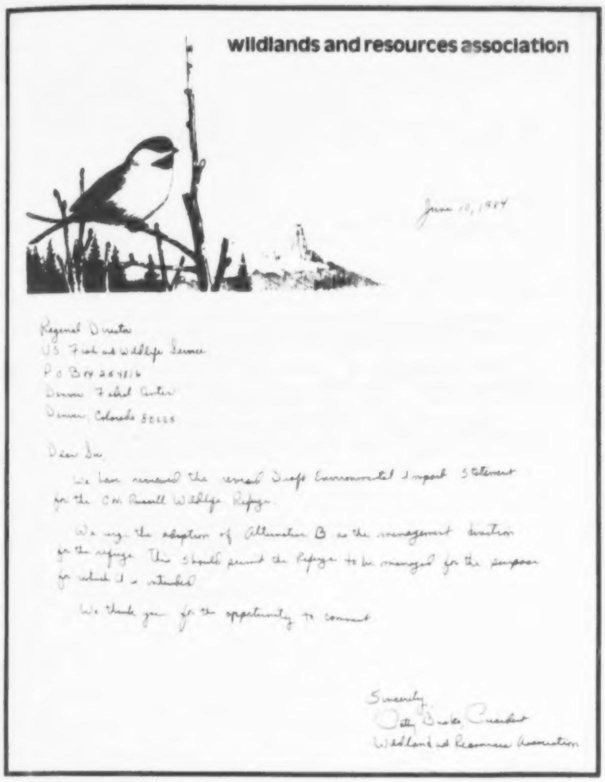
William C Reffalt

William C. Reffalt
Director
Fish & Wildlife Refuge Programs

Response to Wilderness Society

1. Monitoring of range and wildlife responses will be a major part of each habitat management plan.

2. Spreading of livestock reductions among the larger operators to lessen the impact on smaller operators would help the smaller operators. However, the location and pattern of allotments are often such that this would not be practical. Also, the larger operators would have to be willing to absorb the additional reductions.



wildlands and resources association

June 10, 1984

Regional Director
US Fish and Wildlife Service
P O Box 25486
Denver Federal Center
Denver, Colorado 80225

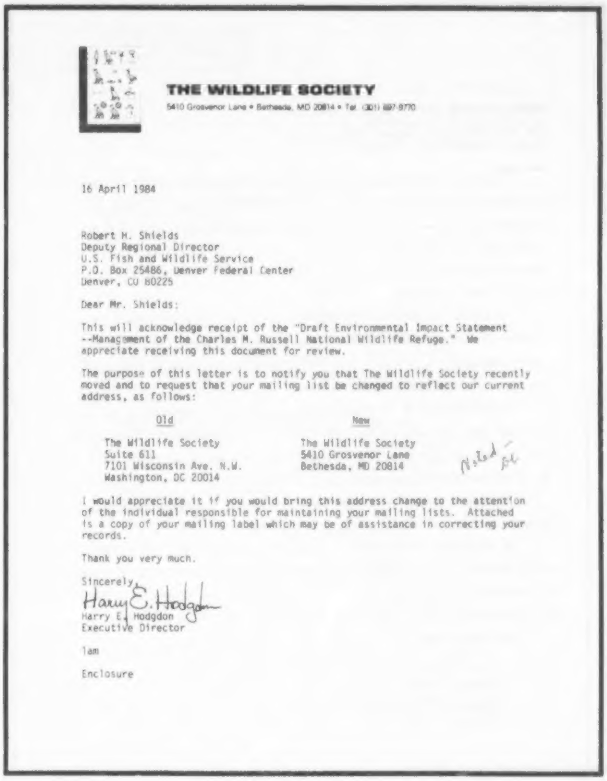
Dear Sir,

We have reviewed the revised Draft Environmental Impact Statement for the CM Russell Wildlife Refuge.

We urge the adoption of Alternative B as the management direction for the refuge. This should permit the Refuge to be managed for the purpose for which it is intended.

We thank you for the opportunity to comment.

Sincerely,
Patty Brooks, President
Wildland and Resources Association



THE WILDLIFE SOCIETY
5410 Grosvenor Lane • Bethesda, MD 20814 • Tel. (301) 897-9770

16 April 1984

Robert H. Shields
Deputy Regional Director
U.S. Fish and Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, CO 80225

Dear Mr. Shields:

This will acknowledge receipt of the "Draft Environmental Impact Statement --Management of the Charles M. Russell National Wildlife Refuge." We appreciate receiving this document for review.

The purpose of this letter is to notify you that The Wildlife Society recently moved and to request that your mailing list be changed to reflect our current address, as follows:

Old	New
The Wildlife Society Suite 611 7101 Wisconsin Ave. N.W. Washington, DC 20014	The Wildlife Society 5410 Grosvenor Lane Bethesda, MD 20814

Noted

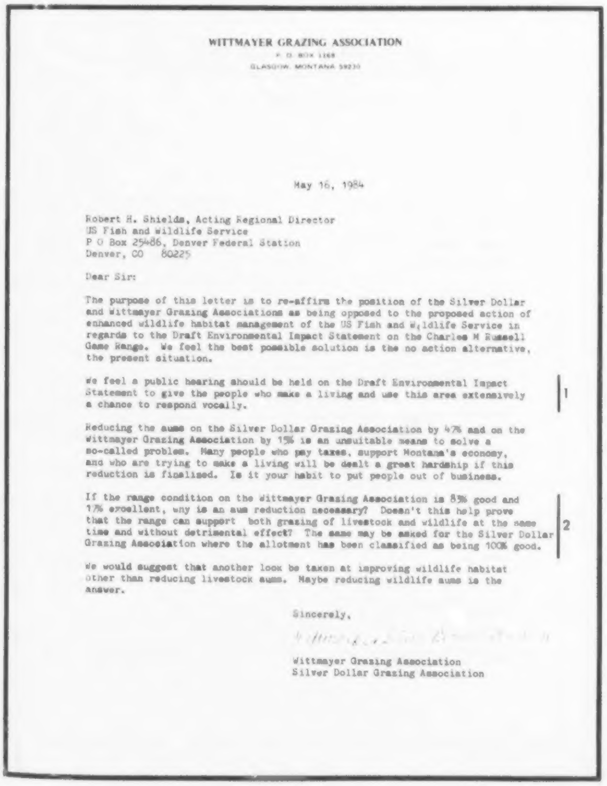
I would appreciate it if you would bring this address change to the attention of the individual responsible for maintaining your mailing lists. Attached is a copy of your mailing label which may be of assistance in correcting your records.

Thank you very much.

Sincerely,
Harry E. Hodgdon
Harry E. Hodgdon
Executive Director

lam

Enclosure



WITTMAYER GRAZING ASSOCIATION
P. O. BOX 1168
GLASGOW, MONTANA 59230

May 16, 1984

Robert H. Shields, Acting Regional Director
US Fish and Wildlife Service
P O Box 25486, Denver Federal Station
Denver, CO 80225

Dear Sir:

The purpose of this letter is to re-affirm the position of the Silver Dollar and Wittmayer Grazing Associations as being opposed to the proposed action of enhanced wildlife habitat management of the US Fish and Wildlife Service in regards to the Draft Environmental Impact Statement on the Charles M Russell Game Range. We feel the best possible solution is the no action alternative, the present situation.

We feel a public hearing should be held on the Draft Environmental Impact Statement to give the people who make a living and use this area extensively a chance to respond vocally. 1

Reducing the aums on the Silver Dollar Grazing Association by 47% and on the Wittmayer Grazing Association by 15% is an unsuitable means to solve a so-called problem. Many people who pay taxes, support Montana's economy, and who are trying to make a living will be dealt a great hardship if this reduction is finalized. Is it your habit to put people out of business.

If the range condition on the Wittmayer Grazing Association is 83% good and 17% excellent, why is an aum reduction necessary? Doesn't this help prove that the range can support both grazing of livestock and wildlife at the same time and without detrimental effect? The same may be asked for the Silver Dollar Grazing Association where the allotment has been classified as being 100% good. 2

We would suggest that another look be taken at improving wildlife habitat other than reducing livestock aums. Maybe reducing wildlife aums is the answer.

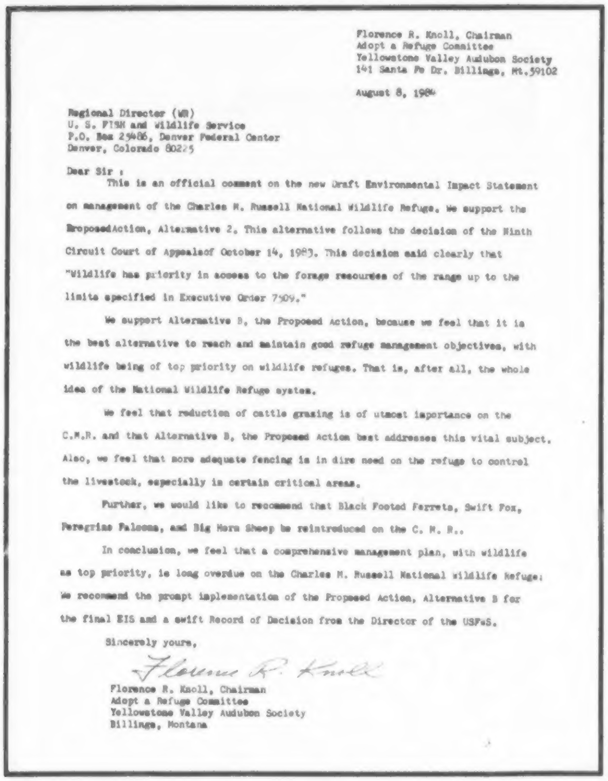
Sincerely,

Wittmayer Grazing Association
Silver Dollar Grazing Association

Response to Wittmayer Grazing Association

1. Public hearings were held on the DEIS in Glasgow, Lewistown, and Missoula on July 31, August 1, and August 2, 1984, respectively. The transcripts of these hearings are reproduced in full in this document.

2. The range condition of the Wittmayer Grazing Association was classified as you indicated. AUM reductions are necessary to improve the habitat for wildlife.



Florence R. Knoll, Chairman
Adopt a Refuge Committee
Yellowstone Valley Audubon Society
141 Santa Fe Dr. Billings, Mt.59102

August 8, 1984

Regional Director (WR)
U. S. FISH and Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, Colorado 80225

Dear Sir :

This is an official comment on the new Draft Environmental Impact Statement on management of the Charles M. Russell National Wildlife Refuge. We support the ProposedAction, Alternative 2. This alternative follows the decision of the Ninth Circuit Court of Appealsof October 14, 1983. This decision said clearly that "Wildlife has priority in access to the forage resources of the range up to the limits specified in Executive Order 7509."

We support Alternative B, the Proposed Action, because we feel that it is the best alternative to reach and maintain good refuge management objectives, with wildlife being of top priority on wildlife refuges. That is, after all, the whole idea of the National Wildlife Refuge system.

We feel that reduction of cattle grazing is of utmost importance on the C.M.R. and that Alternative B, the Proposed Action best addresses this vital subject. Also, we feel that more adequate fencing is in dire need on the refuge to control the livestock, especially in certain critical areas.

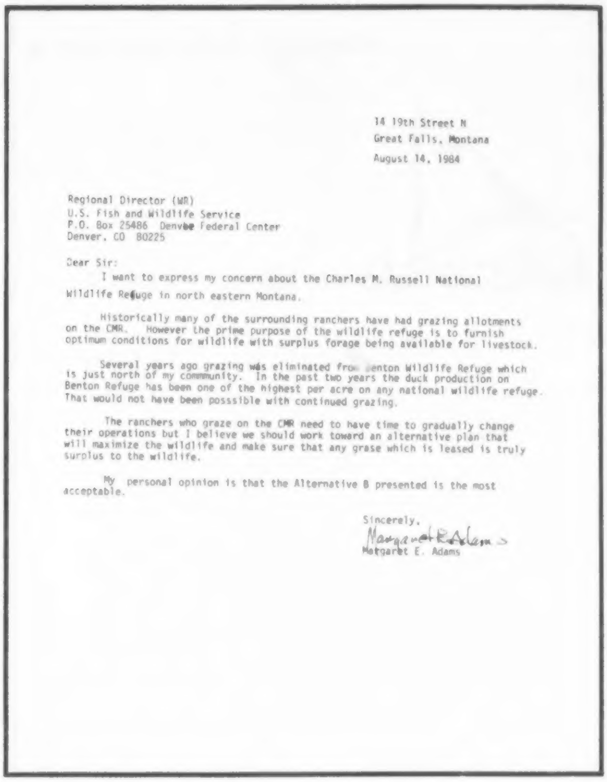
Further, we would like to recommend that Black Footed Ferrets, Swift Fox, Peregrine Falcons, and Big Horn Sheep be reintroduced on the C. M. R..

In conclusion, we feel that a comprehensive management plan, with wildlife as top priority, is long overdue on the Charles M. Russell National wildlife Refuge; We recommend the prompt implementation of the Proposed Action, Alternative B for the final EIS and a swift Record of Decision from the Director of the USF&S.

Sincerely youre,

Florence R. Knoll

Florence R. Knoll, Chairman
Adopt a Refuge Committee
Yellowstone Valley Audubon Society
Billings, Montana



14 19th Street N
Great Falls, Montana

August 14, 1984

Regional Director (WR)
U.S. Fish and Wildlife Service
P.O. Box 25486 Denver Federal Center
Denver, CO 80225

Dear Sir:

I want to express my concern about the Charles M. Russell National Wildlife Refuge in north eastern Montana.

Historically many of the surrounding ranchers have had grazing allotments on the CMR. However the prime purpose of the wildlife refuge is to furnish optimum conditions for wildlife with surplus forage being available for livestock.

Several years ago grazing was eliminated from Benton Wildlife Refuge which is just north of my community. In the past two years the duck production on Benton Refuge has been one of the highest per acre on any national wildlife refuge. That would not have been posssible with continued grazing.

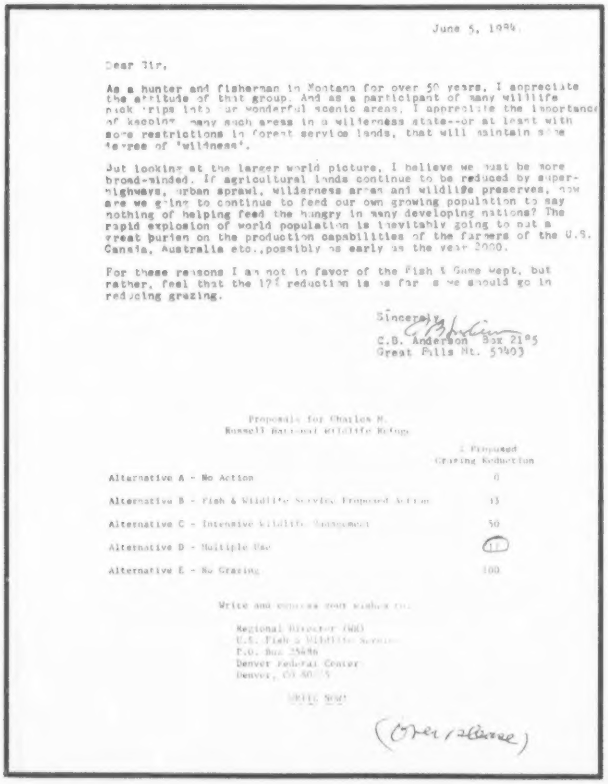
The ranchers who graze on the CMR need to have time to gradually change their operations but I believe we should work toward an alternative plan that will maximize the wildlife and make sure that any grase which is leased is truly surplus to the wildlife.

My personal opinion is that the Alternative B presented is the most acceptable.

Sincerely,

Margaret E. Adams

Margaret E. Adams



June 5, 1984.

Dear Sir,

As a hunter and fisherman in Montana for over 50 years, I appreciate the attitude of that group. And as a participant of many wildlife pack trips into our wonderful scenic areas, I appreciate the importance of keeping many such areas in a wilderness state--or at least with some restrictions in forest service lands, that will maintain some degree of 'wildness'.

But looking at the larger world picture, I believe we must be more broad-minded. If agricultural lands continue to be reduced by super-highways, urban sprawl, wilderness areas and wildlife preserves, how are we going to continue to feed our own growing population to say nothing of helping feed the hungry in many developing nations? The rapid explosion of world population is inevitably going to put a great burden on the production capabilities of the farmers of the U.S. Canada, Australia etc.,possibly as early as the year 2000.

For these reasons I am not in favor of the Fish & Game Dept. but rather, feel that the 17% reduction is as far as we should go in reducing grazing.

Sincerely,

C.B. Anderson Box 2185
Great Falls Mt. 59403

Proposals for Charles M.
Russell National Wildlife Refuge

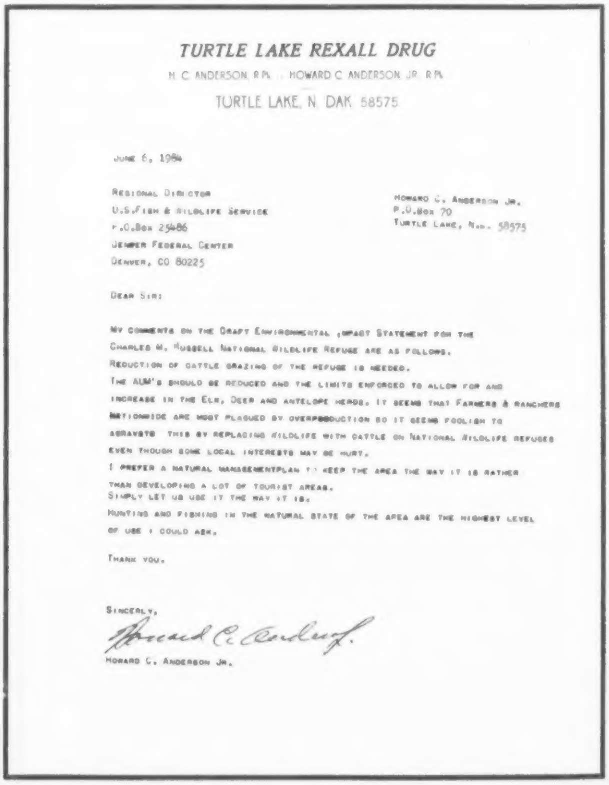
	% Proposed Grazing Reduction
Alternative A - No Action	0
Alternative B - Fish & Wildlife Service Proposed Action	33
Alternative C - Intensive Wildlife Management	50
Alternative D - Multiple Use	17
Alternative E - No Grazing	100

Write and express your wishes to:

Regional Director (WR)
U.S. Fish & Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, CO 80225

WRITE NOW!

(Over/please)



TURTLE LAKE REXALL DRUG
H. C. ANDERSON, R.Ph. · HOWARD C. ANDERSON JR. R.Ph.
TURTLE LAKE, N. DAK. 58575

June 6, 1984

Regional Director
U.S.Fish & Wildlife Service
P.O.Box 25486
Denver Federal Center
Denver, CO 80225

Howard C. Anderson Jr.
P.O.Box 70
Turtle Lake, N.D. 58575

Dear Sir:

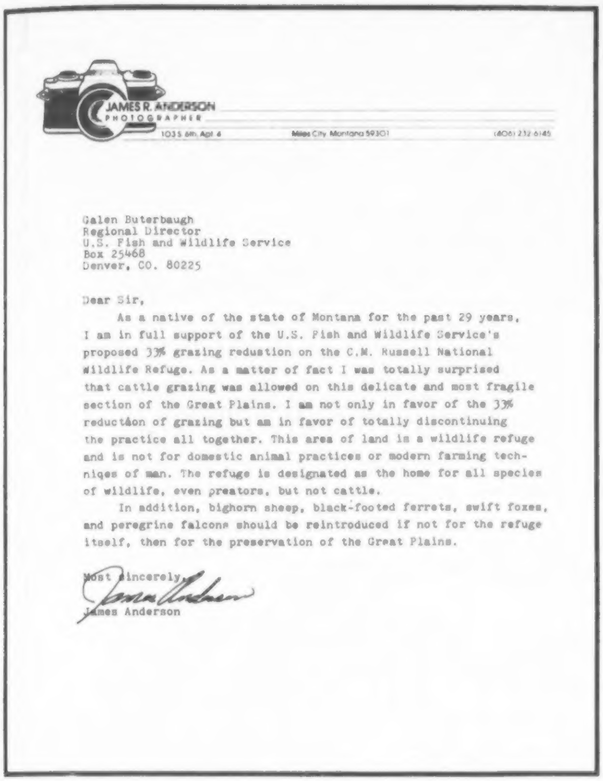
My comments on the Draft Environmental Impact Statement for the Charles M. Russell National Wildlife Refuge are as follows.
Reduction of cattle grazing of the refuge is needed.
The AUM's should be reduced and the limits enforced to allow for and increase in the Elk, Deer and antelope herds. It seems that Farmers & Ranchers Nationwide are most plagued by overproduction so it seems foolish to agravate this by replacing wildlife with cattle on National Wildlife refuges even though some local interests may be hurt.
I prefer a natural managementplan to keep the area the way it is rather than developing a lot of tourist areas.
Simply let us use it the way it is.
Hunting and fishing in the natural state of the area are the highest level of use I could ask.

Thank you.

Sincerly,

Howard C. Anderson

Howard C. Anderson Jr.



JAMES R. ANDERSON
PHOTOGRAPHER
1035 6th, Apt 4 Miles City Montana 59301 (406) 232-6145

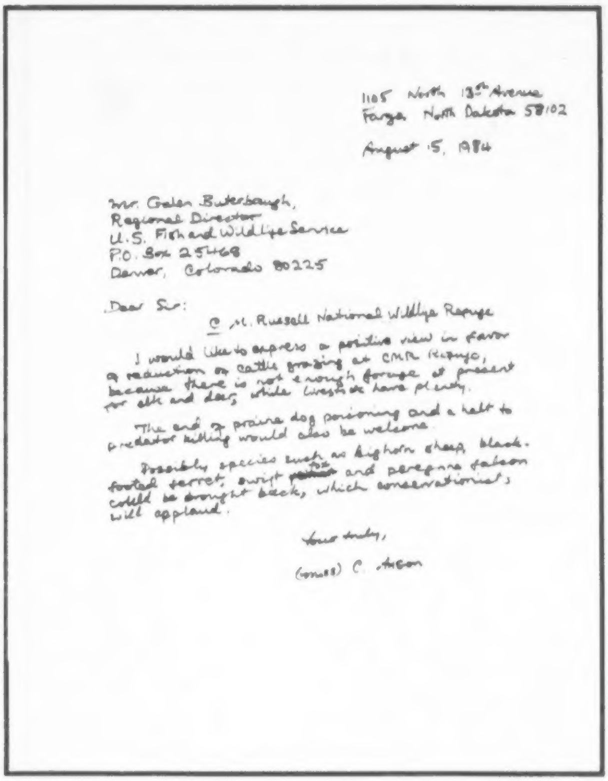
Galen Buterbaugh
Regional Director
U.S. Fish and Wildlife Service
Box 25468
Denver, CO. 80225

Dear Sir,

As a native of the state of Montana for the past 29 years, I am in full support of the U.S. Fish and Wildlife Service's proposed 33% grazing redustion on the C.M. Russell National Wildlife Refuge. As a matter of fact I was totally surprised that cattle grazing was allowed on this delicate and most fragile section of the Great Plains. I am not only in favor of the 33% reductáon of grazing but am in favor of totally discontinuing the practice all together. This area of land is a wildlife refuge and is not for domestic animal practices or modern farming techniqes of man. The refuge is designated as the home for all species of wildlife, even preators, but not cattle.

In addition, bighorn sheep, black-footed ferrets, swift foxes, and peregrine falcons should be reintroduced if not for the refuge itself, then for the preservation of the Great Plains.

Most sincerely,
James Anderson
James Anderson



1105 North 13th Avenue
Fargo North Dakota 58102

August 15, 1984

Mr. Galen Buterbaugh,
Regional Director
U.S. Fish and Wildlife Service
P.O. Box 25468
Denver, Colorado 80225

Dear Sir:

C. M. Russell National Wildlife Refuge

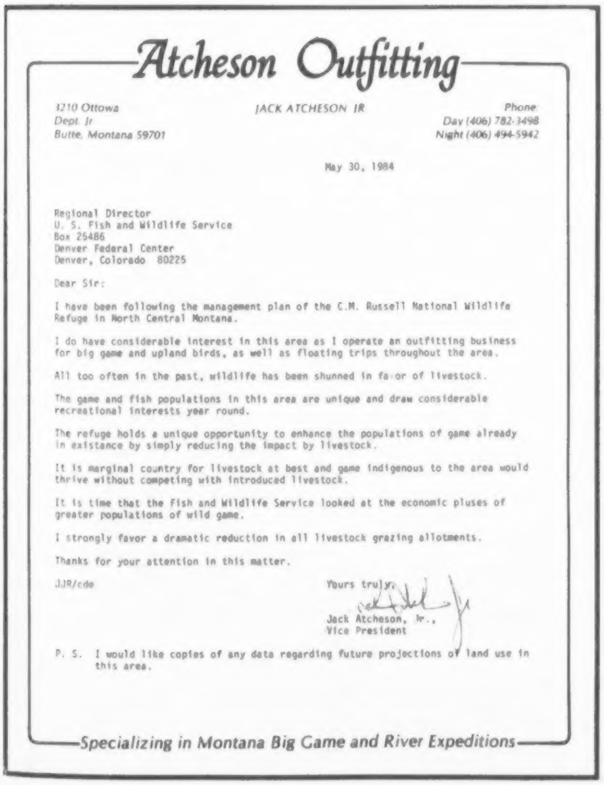
I would like to express a positive view in favor a reduction of cattle grazing at CMR Refuge, because there is not enough forage at present for elk and deer, while livestock have plenty.

The end of prairie dog poisoning and a halt to predator killing would also be welcome.

Possibly species such as bighorn sheep, black-footed ferret, swift ~~[illegible]~~ fox and peregrine falcon could be brought back, which conservationists will applaud.

Yours truly,

([illegible]) C. [illegible]



Atcheson Outfitting

3210 Ottowa
Dept. Jr
Butte, Montana 59701

JACK ATCHESON JR

Phone
Day (406) 782-3498
Night (406) 494-5942

May 30, 1984

Regional Director
U. S. Fish and Wildlife Service
Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Sir:

I have been following the management plan of the C.M. Russell National Wildlife Refuge in North Central Montana.

I do have considerable interest in this area as I operate an outfitting business for big game and upland birds, as well as floating trips throughout the area.

All too often in the past, wildlife has been shunned in favor of livestock.

The game and fish populations in this area are unique and draw considerable recreational interests year round.

The refuge holds a unique opportunity to enhance the populations of game already in existance by simply reducing the impact by livestock.

It is marginal country for livestock at best and game indigenous to the area would thrive without competing with introduced livestock.

It is time that the Fish and Wildlife Service looked at the economic pluses of greater populations of wild game.

I strongly favor a dramatic reduction in all livestock grazing allotments.

Thanks for your attention in this matter.

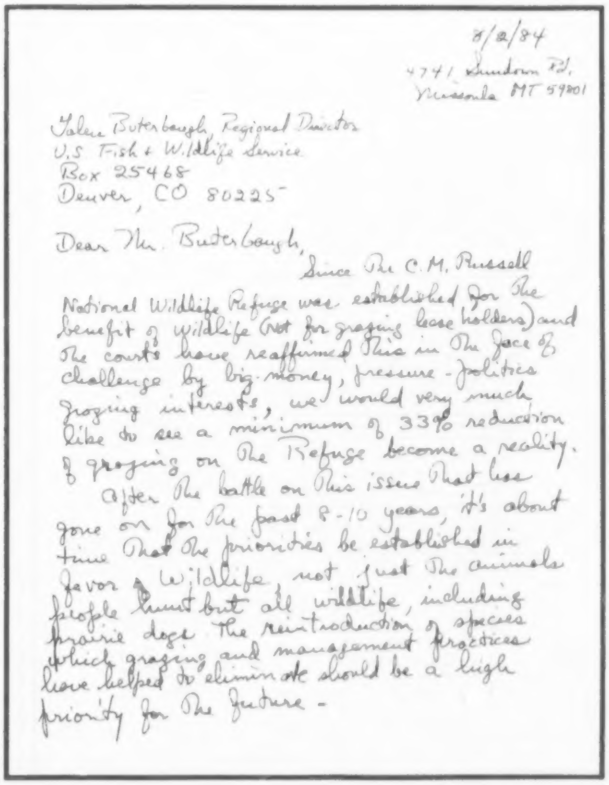
JJR/cde

Yours truly,

Jack Atcheson, Jr.,
Vice President

P. S. I would like copies of any data regarding future projections of land use in this area.

Specializing in Montana Big Game and River Expeditions



8/2/84
4741 Sundown Rd.
Missoula MT 59801

Galen Buterbaugh, Regional Director
U.S Fish + Wildlife Service
Box 25468
Denver, CO 80225

Dear Mr. Buterbaugh,

Since the C.M. Russell National Wildlife Refuge was established for the benefit of wildlife (not for grazing lease holders) and the courts have reaffirmed this in the face of challenge by big-money, pressure-politics grazing interests, we would very much like to see a minimum of 33% reduction of grazing on the Refuge become a reality.

After the battle on this issue that has gone on for the past 8-10 years, it's about time that the priorities be established in favor of wildlife, not just the animals people hunt but all wildlife, including prairie dogs. The reintroduction of species which grazing and management practices have helped to eliminate should be a high priority for the future -

We are opposed to measures taken to enhance the refuge area for stock grazing - Such development as fencing, seeding + water developments should only occur when it can be shown as beneficial to wildlife -

Sincerely,

Alice H. Austin

Copies to: Senator Melcher
Senator Baucus

Box 94
Twin Bridges, Montana 59754

August 10, 1984

Regional Director
U.S. Fish and Wildlife Service (WR)
P.O. Box 25486, Denver Federal Center
Denver, Colorado 80225

Dear Sir:

This is a request to adopt the Proposed Action, Alternative B, of the Environmental Impact Study for the C. M. Russell Wildlife Refuge. Not only does grazing need to be reduced, but subleasing of grazing allotments should also be stopped.

Sincerely,

Craig Ballou

Craig Ballou

Route 1 - Box 118-B-1
Charlo, Montana 59824

May 13, 1984

Regional Director
U.S. Fish and Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Sir:

I am writing to support the Proposed Action of the second Draft EIS for the C. M. Russell National Wildlife Refuge.

The Proposed Action should not be further modified to accommodate livestock interests. It is already a compromise for that purpose. Livestock grazing does need to be reduced by at least a third on the refuge in order to realize wildlife values.

CMR is a wildlife refuge. The habitat should be managed for wildlife. Even though the range is in good condition from a livestock standpoint, grazing reductions and other changes in the Proposed Action are needed to improve the habitat for wildlife. Even though I am a hunter, I am pleased that the refuge is being managed for all wildlife, not just game species. With heavy pressure being put on prairie dogs on private lands and other public lands, it is entirely appropriate that on CMR, a wildlife refuge, that prairie dogs are considered part of the desirable wildlife community.

The boundary of CMR should be fenced wherever needed to prevent livestock trespass. Other than fencing and additional water developments for wildlife (fence out livestock), efforts should be made to retain the refuge in as natural a condition as possible.

The public wanting to view wildlife need greater consideration. A portion of the refuge should be closed to hunting where wildlife is undisturbed to benefit this public. 1

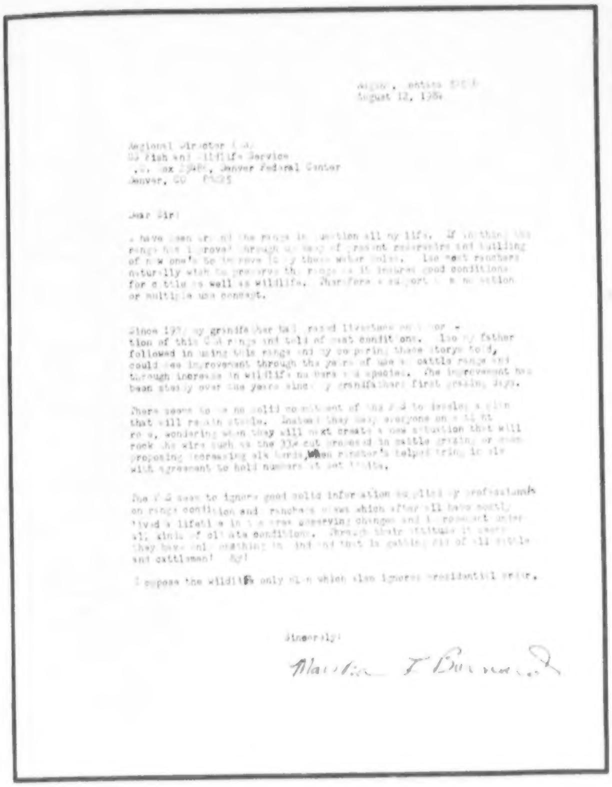
Sincerely,

Robert M. Ballou

Robert M. Ballou

Response to Robert M. Ballou

1. Please see response to Montana Audubon Council on page 281.



[illegible], Montana [illegible]
August 12, 1984

Regional Director [illegible]
US Fish and Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, CO 80225

Dear Sir:

I have been around the range in question all my life. If anything the range has improved through the help of present reservoirs and building of new one's to improve [illegible] these water holes. The most ranchers naturally wish to preserve the range as it insures good conditions for cattle as well as wildlife. Therefore I support the no action or multiple use concept.

Since 19[illegible] my grandfather has raised livestock on a portion of this CMR range and told of past conditions. Also my father followed in using this range and by comparing these storys told, could see improvement through the years of use as cattle range and through increase in wildlife numbers and species. The improvement has been steady over the years since my grandfathers first grazing days.

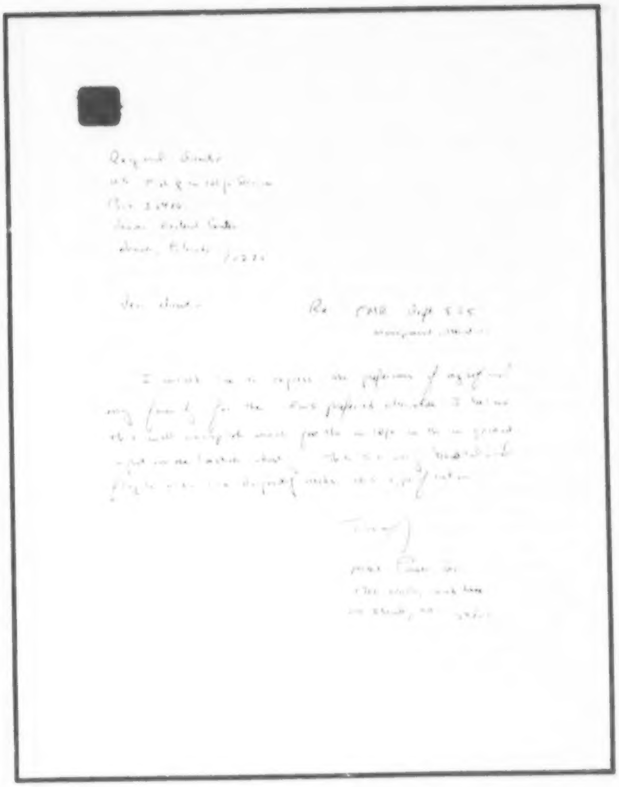
There seems to be no solid commitment of the F&W to develop a plan that will remain stable. Instead they keep everyone on a tight rope, wondering when they will next create a new situation that will rock the wire such as the 33% cut proposed in cattle grazing or even proposing increasing elk herds, when rancher's helped bring in elk with agreement to hold numbers at set limits.

The F&W seem to ignore good solid information supplied by professionals on range condition and ranchers views which after all have mostly lived a lifetime in the area observing changes and improvement under all kinds of climate conditions. Through their attitude it seems they have only one thing in mind and that is getting rid of all cattle and cattlemen! Why!

I oppose the wildlife only plan which also ignores presidential order.

Sincerely:

Martin T Barnard



[redacted]

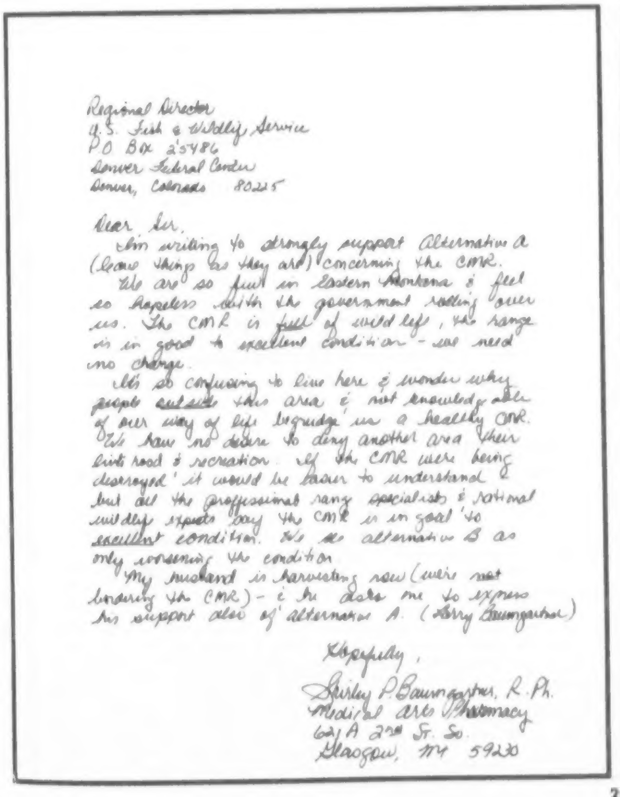
Regional Director
U.S. Fish & Wildlife Service
Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Director: Re: CMR Draft EIS
management alternatives

I would like to express the preference of myself and my family for the F&WS preferred alternative. I believe it's a well [illegible] for the wildlife on the [illegible] [illegible] [illegible] [illegible]

Thank you

[illegible]



Regional Director
U.S. Fish & Wildlife Service
P.O Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Sir,

I'm writing to strongly support Alternative A (leave things as they are) concerning the CMR.

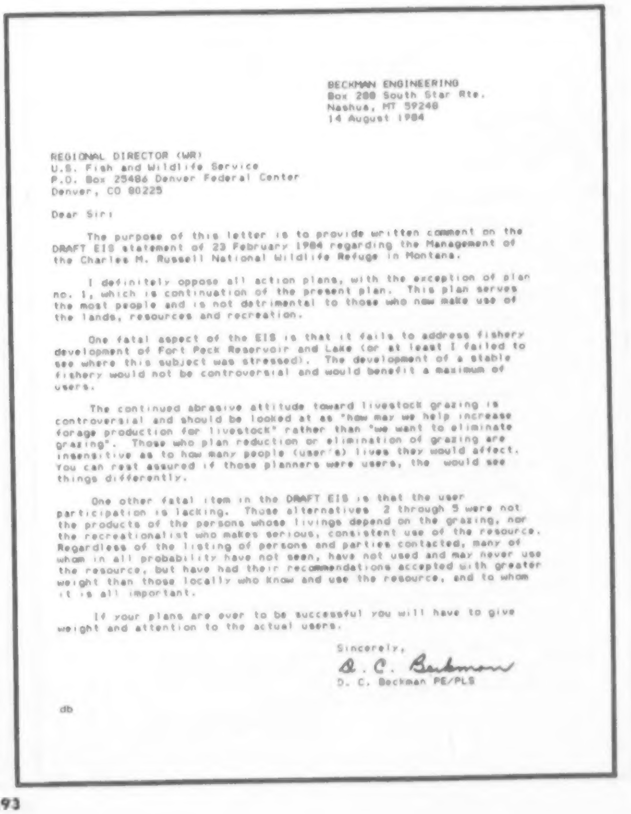
We are so few in Eastern Montana & feel so hopeless with the government rolling over us. The CMR is full of wild life, the range is in good to excellent condition - we need no change.

It's so confusing to live here & wonder why people outside this area & not knowledgeable of our way of life begrudge us a healthy CMR. We have no desire to deny another area their livelihood & recreation. If the CMR were being destroyed it would be easier to understand & but all the professional range specialists & national wildlife experts say the CMR is in good to excellent condition. We see alternative B as only worsening the condition.

My husband is harvesting now (we're not bordering the CMR) - & he asks me to express his support also of alternative A. (Larry Baumgartner)

Hopefully,

Shirley P. Baumgartner, R.Ph.
Medical Arts Pharmacy
621 A 2nd St. So.
Glasgow, MT 59230



BECKMAN ENGINEERING
Box 288 South Star Rte.
Nashua, MT 59248
14 August 1984

REGIONAL DIRECTOR (WR)
U.S. Fish and Wildlife Service
P.O. Box 25486 Denver Federal Center
Denver, CO 80225

Dear Sir:

The purpose of this letter is to provide written comment on the DRAFT EIS statement of 23 February 1984 regarding the Management of the Charles M. Russell National Wildlife Refuge in Montana.

I definitely oppose all action plans, with the exception of plan no. 1, which is continuation of the present plan. This plan serves the most people and is not detrimental to those who now make use of the lands, resources and recreation.

One fatal aspect of the EIS is that it fails to address fishery development of Fort Peck Reservoir and Lake (or at least I failed to see where this subject was stressed). The development of a stable fishery would not be controversial and would benefit a maximum of users.

The continued abrasive attitude toward livestock grazing is controversial and should be looked at as "how may we help increase forage production for livestock" rather than "we want to eliminate grazing". Those who plan reduction or elimination of grazing are insensitive as to how many people (user's) lives they would affect. You can rest assured if those planners were users, the would see things differently.

One other fatal item in the DRAFT EIS is that the user participation is lacking. Those alternatives 2 through 5 were not the products of the persons whose livings depend on the grazing, nor the recreationalist who makes serious, consistent use of the resource. Regardless of the listing of persons and parties contacted, many of whom in all probability have not seen, have not used and may never use the resource, but have had their recommendations accepted with greater weight than those locally who know and use the resource, and to whom it is all important.

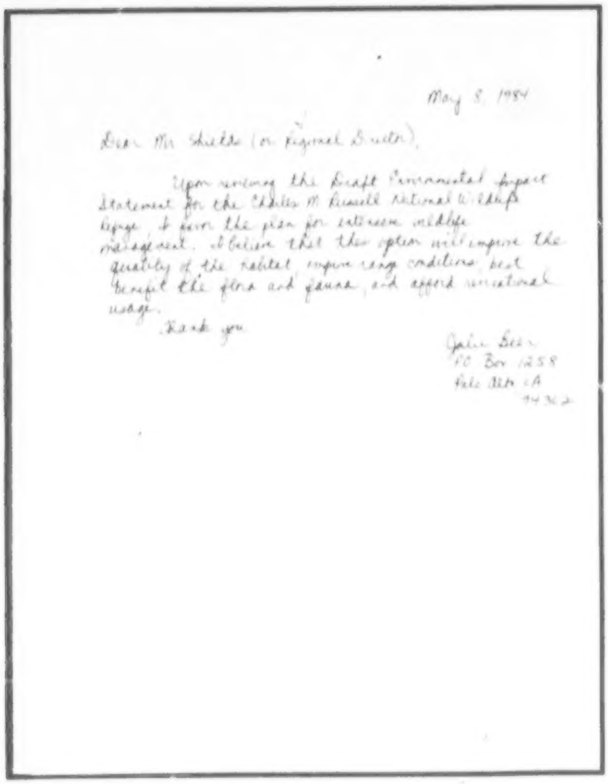
If your plans are ever to be successful you will have to give weight and attention to the actual users.

Sincerely,

D. C. Beckman

D. C. Beckman PE/PLS

db



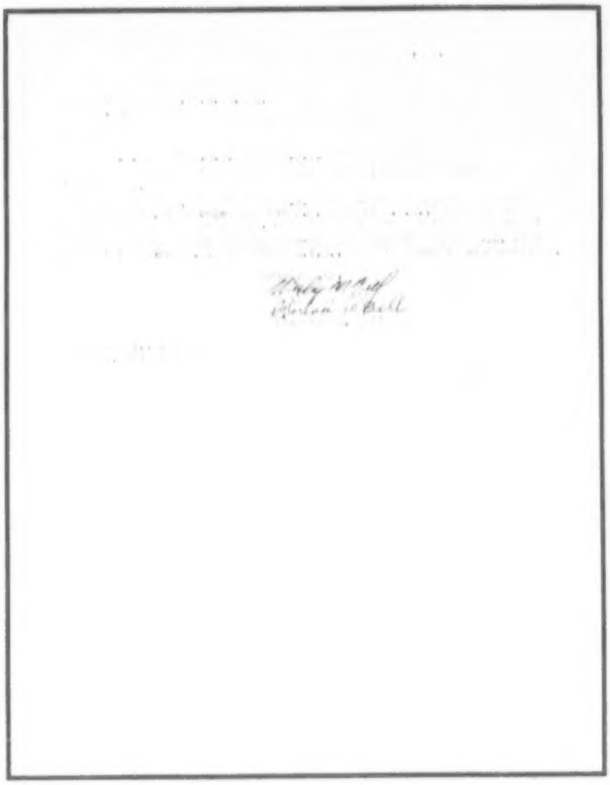
May 8, 1984

Dear Mr Shields (or Regional Director),

Upon reviewing the Draft Environmental Impact Statement for the Charles M Russell National Wildlife Refuge, I favor the plan for extensive wildlife management. I believe that this option will improve the quality of the habitat, improve range conditions, best benefit the flora and fauna, and afford recreational usage.

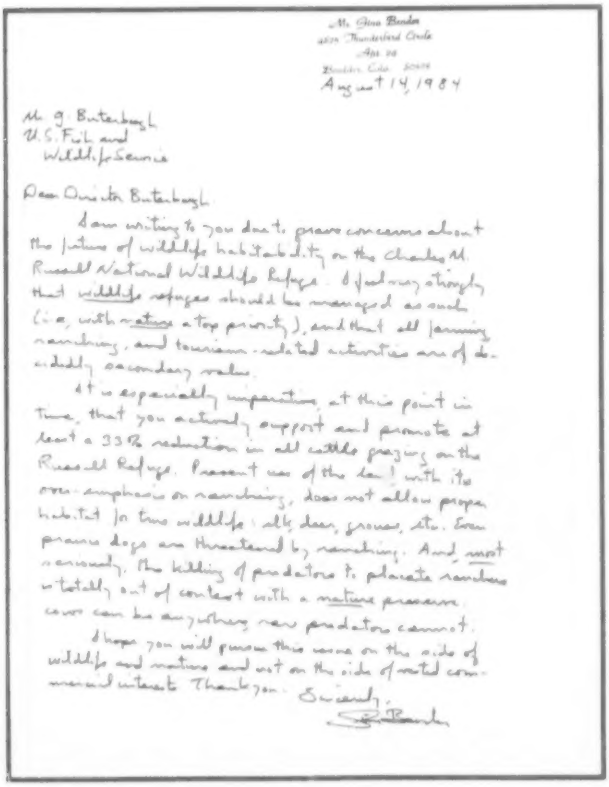
Thank you

Julie Beer
PO Box 1258
Palo Alto CA
94302



[illegible]

[illegible]
Harlan W. Bell



Ms. Gina Bender
4575 Thunderbird Circle
Apt 20
Boulder Colo 80303
August 14, 1984

Mr. G. Buterbaugh
U.S. Fish and
Wildlife Service

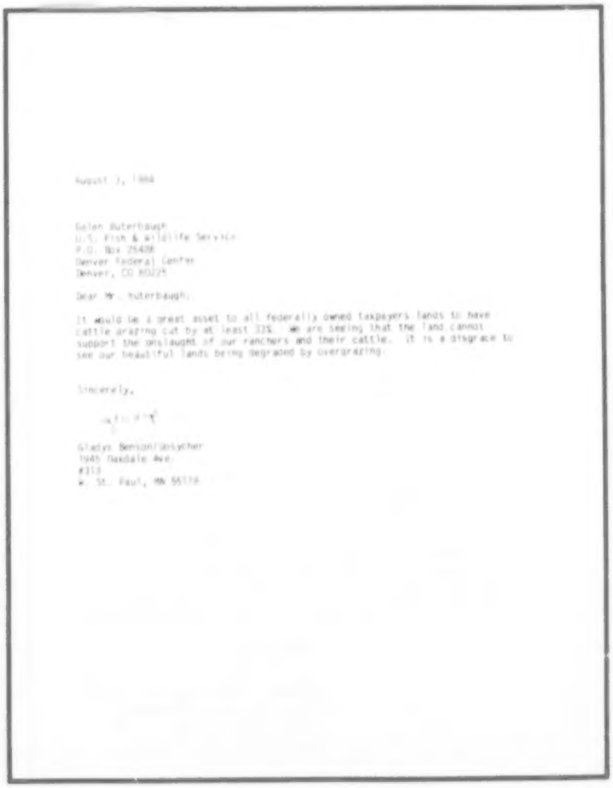
Dear Director Buterbaugh,

I am writing to you due to grave concerns about the future of wildlife habitability on the Charles M. Russell National Wildlife Refuge. I feel very strongly that wildlife refuges should be managed as such (i.e., with nature a top priority), and that all farming, ranching, and tourism-related activities are of decidedly secondary value.

It is especially imperative, at this point in time, that you actively support and promote at least a 33% reduction in all cattle grazing on the Russell Refuge. Present use of the land with its over-emphasis on ranching, does not allow proper habitat for true wildlife: elk, deer, grouse, etc. Even prairie dogs are threatened by ranching. And most seriously, the killing of predators to placate ranchers is totally out of context with a nature preserve. Cows can live anywhere; predators cannot.

I hope you will pursue this issue on the side of wildlife and nature and not on the side of vested commercial interest. Thank you. Sincerely,

G. Bender



August 3, 1984

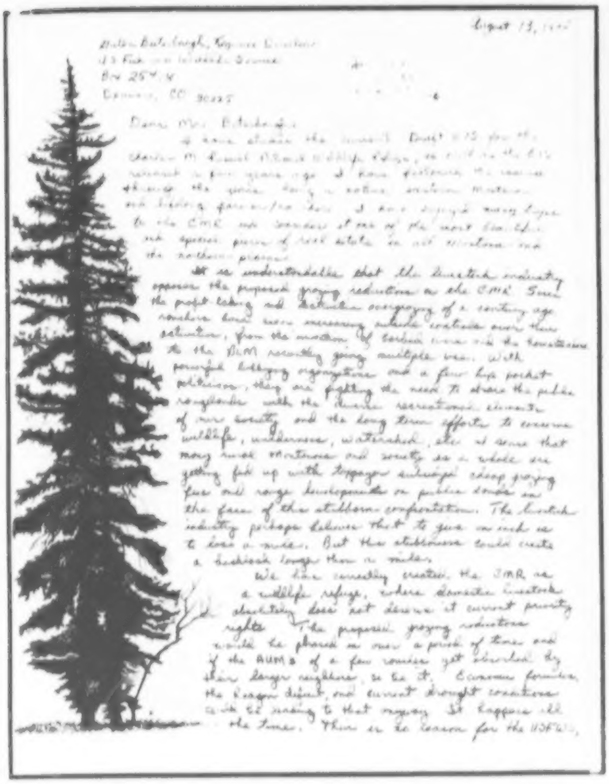
Galen Buterbaugh
U.S. Fish & Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, CO 80225

Dear Mr. Buterbaugh:

It would be a great asset to all federally owned taxpayers lands to have cattle grazing cut by at least 33%. We are seeing that the land cannot support the onslaught of our ranchers and their cattle. It is a disgrace to see our beautiful lands being degraded by overgrazing.

Sincerely,

Gladys Benson/Dotycher
1945 Oakdale Ave.
#313
W. St. Paul, MN 55118



August 13, 1985

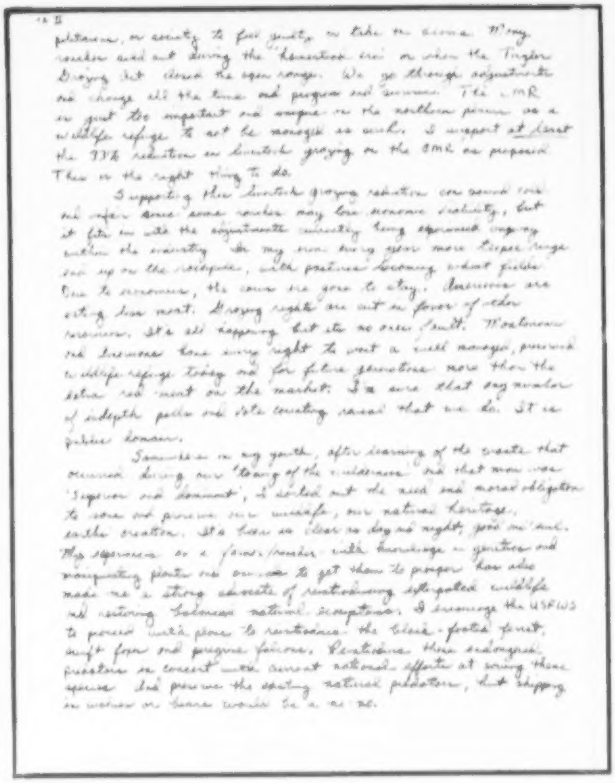
Galen Buterbaugh, Regional Director
US Fish and Wildlife Service
Box 25486
Denver, CO 80225

Dear Mr. Buterbaugh:

I have studied the current Draft EIS for the Charles M. Russell National Wildlife Refuge, as well as the EIS released a few years ago. I have followed the issues through the years, being a native Montanan and lifelong farmer/rancher. I have enjoyed many trips to the CMR and consider it one of the most beautiful and special pieces of real estate in all Montana and the northern prairie.

It is understandable that the livestock industry opposes the proposed grazing reductions on the CMR. Since the profit-taking and destructive overgrazing of a century ago ranchers have been increasing subsidized controls over their activities, from the creation of Taylor Grazing and the transitions to the BLM recently going multiple use. With powerful lobbying organizations and a few hip pocket politicians, they are fighting the need to share the public rangelands with the diverse recreational elements of our society and the long term efforts to conserve wildlife, wilderness, watershed, etc. I sense that many rural Montanans and society as a whole are getting fed up with taxpayer subsidized cheap grazing fees and range developments on public lands in the face of this stubborn confrontation. The livestock industry perhaps believes that to give an inch is to lose a mile. But the stubborness could create a backlash longer than a mile.

We have correctly created the CMR as a wildlife refuge, where domestic livestock absolutely does not deserve its current priority rights. The proposed grazing reductions would be phased in over a period of time and if the AUMs of a few ranches get absorbed by their larger neighbors, so be it. Economic forces, the Reagan deficit, and current drought conditions will be leading to that anyway. It happens all the time. There is no reason for the USFWS,

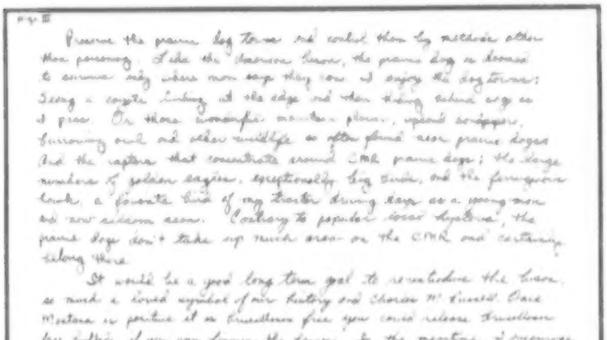


pg II

politicians, or society to feel guilty or take the blame. Many ranchers sold out during the "homestead era" or when the Taylor Grazing Act closed the open range. We go through adjustments and change all the time and progress and survive. The CMR is just too important and unique on the northern prairie as a wildlife refuge to not be managed as such. I support at least the 33% reduction in livestock grazing on the CMR as proposed. This is the right thing to do.

Supporting this livestock grazing reduction can sound cold and unfair since some ranches may lose economic viability, but it fits in with the adjustments currently being experienced ongoing within the industry. In my own county each year more Hereford range end up on the auction block, with pastures becoming wheat fields. Due to economics, the cows are gone to stay. Americans are eating less meat. Grazing rights are out in favor of other resources. It's all happening but it's no one's fault. Montanans and Americans have every right to want a well managed, preserved wildlife refuge today and for future generations more than the extra red meat on the market. I'm sure that any number of indepth polls and data counting reveal that we do. It is public domain.

Sometime in my youth, after learning of the waste that occurred during our 'taming of the wilderness' and that man was 'superior and dominant', I sorted out the need and moral obligation to save and preserve our wildlife, our natural heritage, earth's creation. It's been as clear as day and night, good and evil. My experience as a farmer/rancher with knowledge in genetics and manipulating plants and animals to get them to prosper has also made me a strong advocate of reintroducing extirpated wildlife and restoring balanced natural ecosystems. I encourage the USFWS to proceed with plans to reintroduce the black-footed ferret, swift fox and peregrine falcons. Reintroduce these endangered predators in concert with current national efforts at saving these species and preserve the existing natural predators, but shipping in wolves or bears would be a no no.



page III

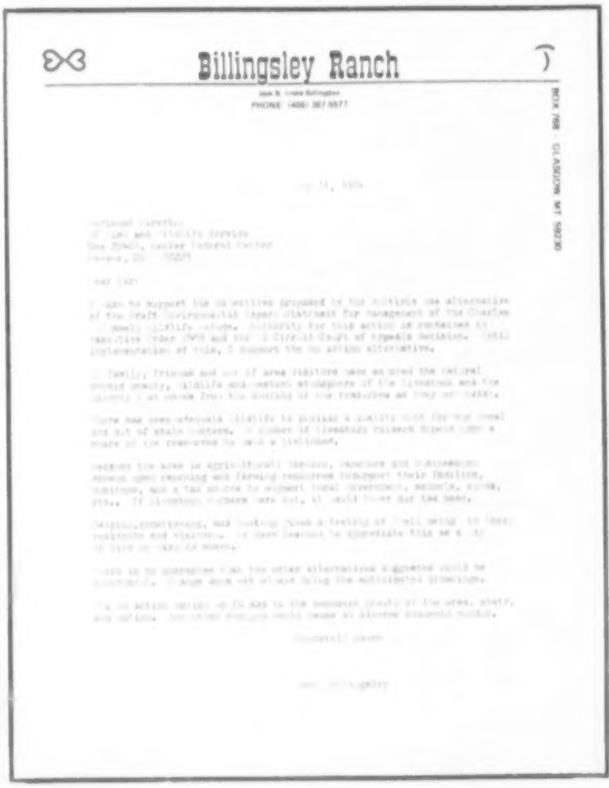
Preserve the prairie dog towns and control them by methods other than poisoning. Like the American bison, the prairie dog is doomed to survive only where man says they can. I enjoy the dog towns: Seeing a coyote lurking at the edge and then diving below cup as I pass. Or those wonderful mountain plover, upland sandpipers, burrowing owl and other wildlife so often found near prairie dogs. And the raptors that concentrate around CMR prairie dogs; the large numbers of golden eagles, exceptionally big birds, and the ferruginous hawk, a favorite bird of my tractor driving days as a young man and now seldom seen. Contrary to popular local hysteria, the prairie dogs don't take up much area on the CMR and certainly belong there.

It would be a good long term goal to reintroduce the bison, so much a loved symbol of our history and Charles M. Russell. Once Montana is positive it is brucellosis free you could release brucellosis free buffalo, if you can finance the fences. In the meantime, I encourage you to work with the strong publics that be to make additional releases of bighorn sheep in the Burnt Lodge and Tambor Ridge areas. We need more than the one thriving herd so that the rams can inter-breed and keep the genetic soup stirred up and the reintroduction efforts successful.

I also support designation of the proposed wilderness areas. Being really quite non-controversial boundaries, it seems to me our Congressional delegation would have designated them wilderness by now. Nevertheless, the CMR should manage the refuge for its natural values and avoid further manipulative range developments and mechanical impacts.

I enjoyed a wonderful overnight hike/camping trip to the top of Brandon Butte this spring. We observed at close range at least 27 bighorn sheep, including many lambs. I've been surrounded by bighorns in Deep Creek on the Rocky Mountain Front but it was even more special in the badlands of my familiar and native northern prairie. At sunrise from our tent, for about a half hour we observed 6 young elk and 6 bighorn sheep grazing and playing together about 100 yards away on the flat topped butte. So special! It just filled me with warm feelings, tears of joy and hope for mankind looking through the peace out on the lake bed of my grandfathers helped to create. I look forward to sharing the CMR's special gift and secrets with my grandchildren. Take good care of the Missouri Breaks refuge for all of us. Thank you.

Sincerely,



Billingsley Ranch

Jack & Linda Billingsley
PHONE (406) 367-5577

BOX 768 · GLASGOW MT 59230

[illegible]

Regional Director
US Fish and Wildlife Service
Box 25486, Denver Federal Center
Denver, CO 80225

Dear Sir:

I wish to support the objectives proposed in the multiple use alternative of the Draft Environmental Impact Statement for management of the Charles M. Russell Wildlife Refuge. Authority for this action is contained in Executive Order 7509 and the 9th Circuit Court of Appeals decision. Until implementation of this, I support the no action alternative.

My family, friends and out of area visitors have enjoyed the natural scenic beauty, wildlife and western atmosphere of the livestock and the [illegible] that comes from the mixing of the resources as they are used.

There has been adequate wildlife to provide a quality hunt for our local and out of state hunters. A number of livestock raisers depend upon a share of the resources to make a livelihood.

Because the area is agricultural [illegible], ranchers and businessmen depend upon ranching and farming resources to support their families, business, and a tax source to support local government, schools, roads, etc.. If livestock numbers were cut, it would lower our tax base.

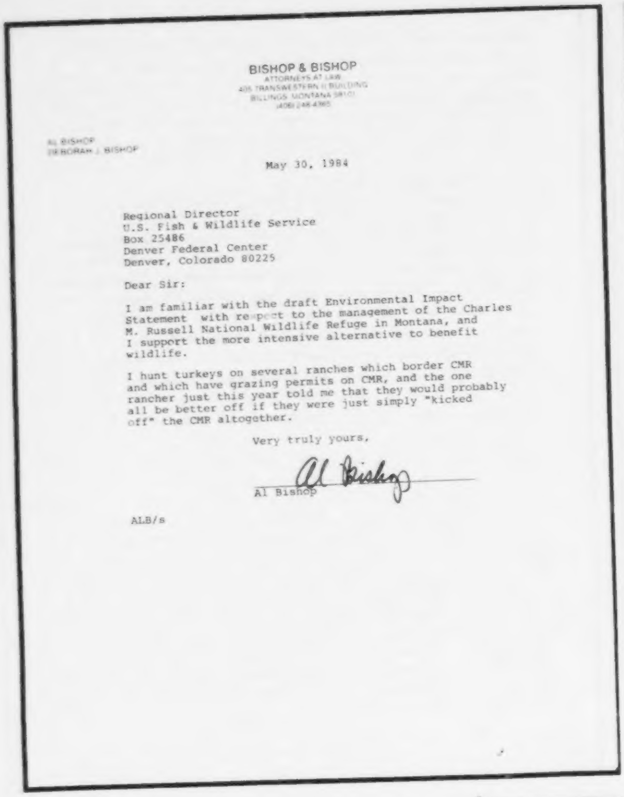
Camping, snowmobiling, and hunting gives a feeling of well being to these residents and visitors. We have learned to appreciate this as a way of life we want to keep.

There is no guarantee that the other alternatives suggested would be successful. Change does not always bring the anticipated [illegible].

The no action option would add to the economic growth of the area, state, and nation. Any other options would cause an adverse economic impact.

Sincerely yours,

Jack Billingsley



BISHOP & BISHOP
ATTORNEYS AT LAW
405 TRANSWESTERN II BUILDING
BILLINGS, MONTANA 59101
(406) 248-4365

AL BISHOP
DEBORAH J. BISHOP

May 30, 1984

Regional Director
U.S. Fish & Wildlife Service
Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Sir:

I am familiar with the draft Environmental Impact Statement with respect to the management of the Charles M. Russell National Wildlife Refuge in Montana, and I support the more intensive alternative to benefit wildlife.

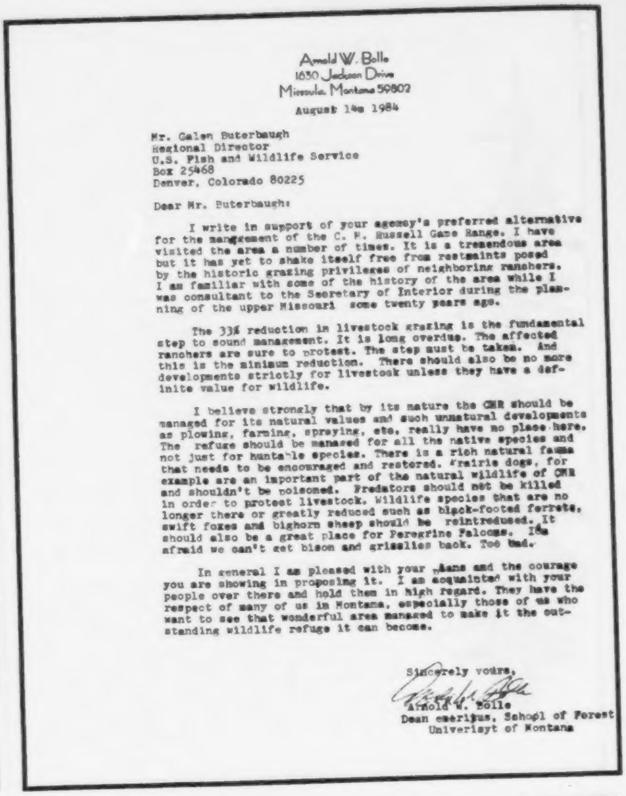
I hunt turkeys on several ranches which border CMR and which have grazing permits on CMR, and the one rancher just this year told me that they would probably all be better off if they were just simply "kicked off" the CMR altogether.

Very truly yours,

Al Bishop

Al Bishop

ALB/s



Arnold W. Bolle
1630 Jackson Drive
Missoula, Montana 59802

August 14, 1984

Mr. Galen Buterbaugh
Regional Director
U.S. Fish and Wildlife Service
Box 25468
Denver, Colorado 80225

Dear Mr. Buterbaugh:

I write in support of your agency's preferred alternative for the mangement of the C. M. Russell Game Range. I have visited the area a number of times. It is a tremendous area but it has yet to shake itself free from restraints posed by the historic grazing privileges of neighboring ranchers. I am familiar with some of the history of the area while I was consultant to the Secretary of Interior during the planning of the upper Missouri some twenty years ago.

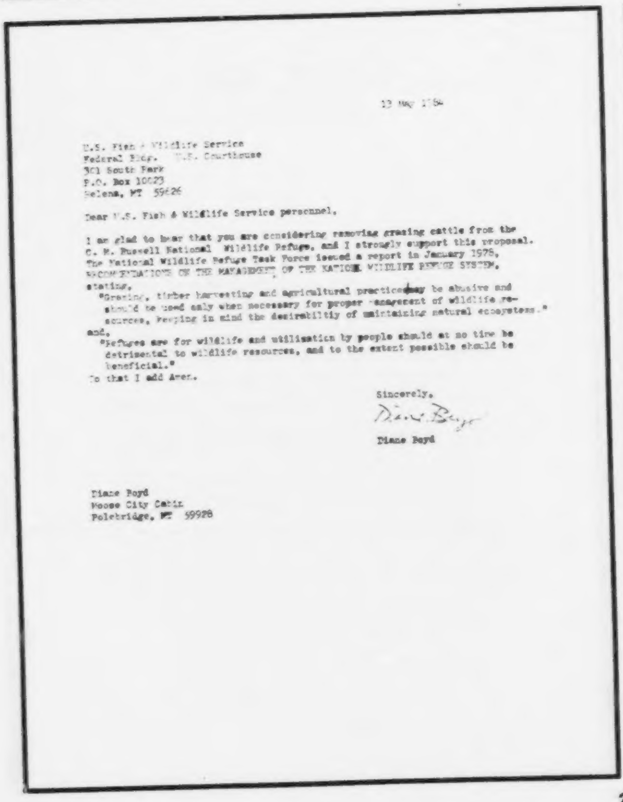
The 33% reduction in livestock grazing is the fundamental step to sound management. It is long overdue. The affected ranchers are sure to protest. The step must be taken. And this is the minimum reduction. There should also be no more developments strictly for livestock unless they have a definite value for wildlife.

I believe strongly that by its nature the CMR should be managed for its natural values and such unnatural developments as plowing, farming, spraying, etc. really have no place here. The refuge should be managed for all the native species and not just for huntable species. There is a rich natural fauna that needs to be encouraged and restored. Prairie dogs, for example are an important part of the natural wildlife of CMR and shouldn't be poisoned. Predators should not be killed in order to protect livestock. Wildlife species that are no longer there or greatly reduced such as black-footed ferrets, swift foxes and bighorn sheep should be reintroduced. It should also be a great place for Peregrine Falcons. I'm afraid we can't get bison and grizzlies back. Too bad.

In general I am pleased with your plans and the courage you are showing in proposing it. I am acquainted with your people over there and hold them in high regard. They have the respect of many of us in Montana, especially those of us who want to see that wonderful area managed to make it the outstanding wildlife refuge it can become.

Sincerely yours,

Arnold W. Bolle
Dean emeritus, School of Forest
Univerisyt of Montana



13 May 1984

U.S. Fish & Wildlife Service
Federal Bldg. U.S. Courthouse
301 South Park
P.O. Box 10023
Helena, MT 59626

Dear U.S. Fish & Wildlife Service personnel,

I am glad to hear that you are considering removing grazing cattle from the C. M. Russell National Wildlife Refuge, and I strongly support this proposal. The National Wildlife Refuge Task Force issued a report in January 1978, RECOMMENDATIONS ON THE MANAGEMENT OF THE NATIONAL WILDLIFE REFUGE SYSTEM, stating,

> "Grazing, timber harvesting and agricultural practices may be abusive and should be used only when necessary for proper management of wildlife resources, keeping in mind the desirability of maintaining natural ecosystems."

and,

> "Refuges are for wildlife and utilization by people should at no time be detrimental to wildlife resources, and to the extent possible should be beneficial."

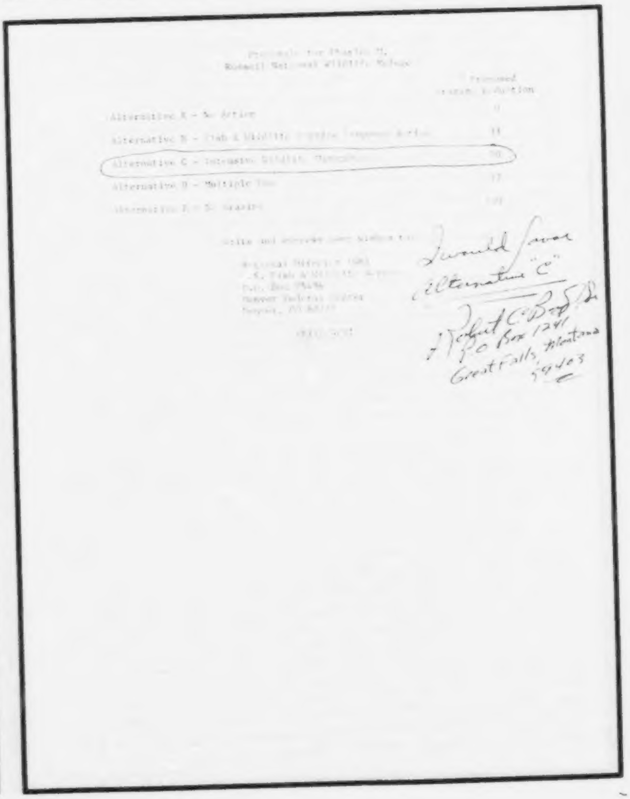
To that I add Amen.

Sincerely,

Diane Boyd

Diane Boyd

Diane Boyd
Moose City Cabin
Polebridge, MT 59928



Proposals for Charles M.
Russell National Wildlife Refuge

	% Proposed Grazing Reduction
Alternative A - No Action	0
Alternative B - Fish & Wildlife [illegible]	33
Alternative C - Intensive Wildlife Management	50
Alternative D - Multiple Use	17
Alternative E - No Grazing	100

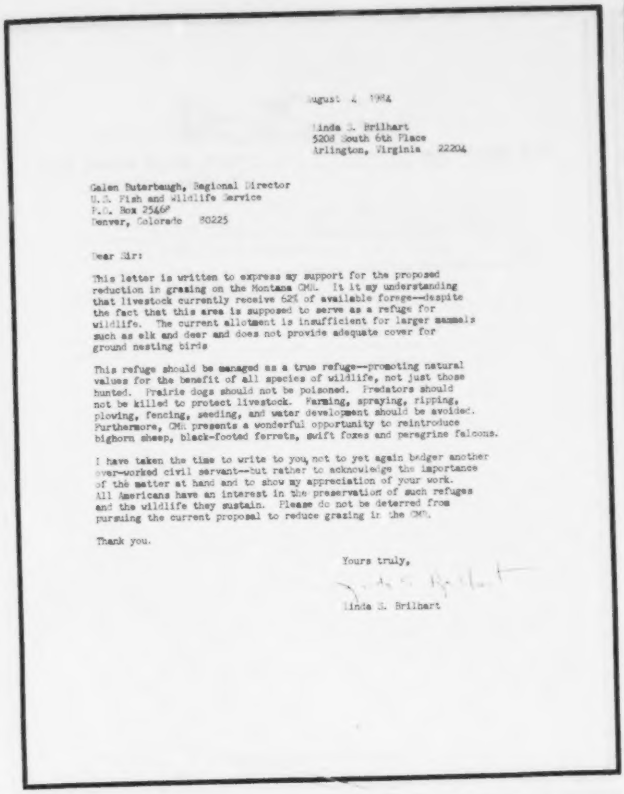
Write and express your wishes to:

Regional Director [illegible]
U.S. Fish & Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, CO 80225

[illegible]

I would favor
Alternative "C"

Robert C. [illegible] Sr.
P.O. Box 1241
Great Falls, Montana
59403



August 4 1984

Linda S. Brilhart
5208 South 6th Place
Arlington, Virginia 22204

Galen Buterbaugh, Regional Director
U.S. Fish and Wildlife Service
P.O. Box 25468
Denver, Colorado 80225

Dear Sir:

This letter is written to express my support for the proposed reduction in grazing on the Montana CMR. It it my understanding that livestock currently receive 62% of available forage—despite the fact that this area is supposed to serve as a refuge for wildlife. The current allotment is insufficient for larger mammals such as elk and deer and does not provide adequate cover for ground nesting birds

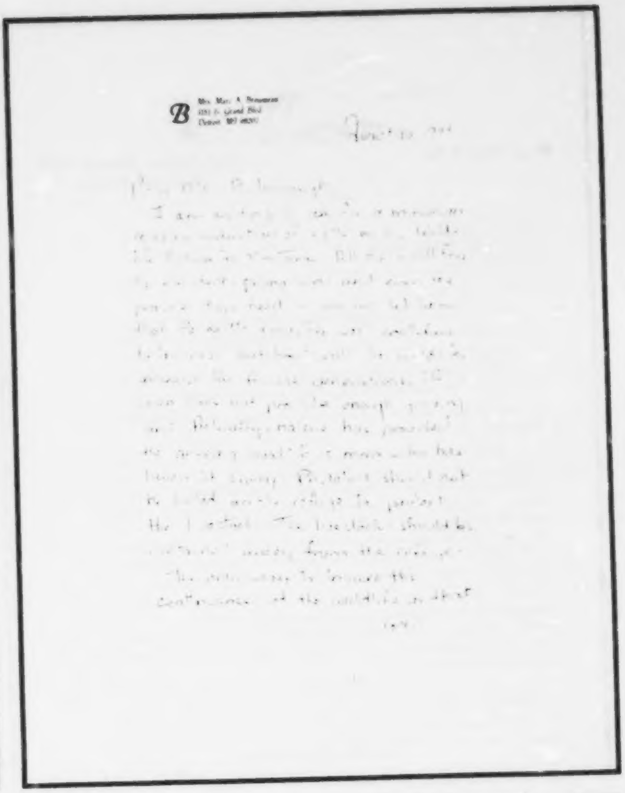
This refuge should be managed as a true refuge—promoting natural values for the benefit of all species of wildlife, not just those hunted. Prairie dogs should not be poisoned. Predators should not be killed to protect livestock. Farming, spraying, ripping, plowing, fencing, seeding, and water development should be avoided. Furthermore, CMR presents a wonderful opportunity to reintroduce bighorn sheep, black-footed ferrets, swift foxes and peregrine falcons.

I have taken the time to write to you, not to yet again badger another over-worked civil servant—but rather to acknowledge the importance of the matter at hand and to show my appreciation of your work. All Americans have an interest in the preservation of such refuges and the wildlife they sustain. Please do not be deterred from pursuing the current proposal to reduce grazing in the CMR.

Thank you.

Yours truly,

Linda S. Brilhart



Mrs. Marc A. [illegible]
[illegible]
[illegible]

[illegible]

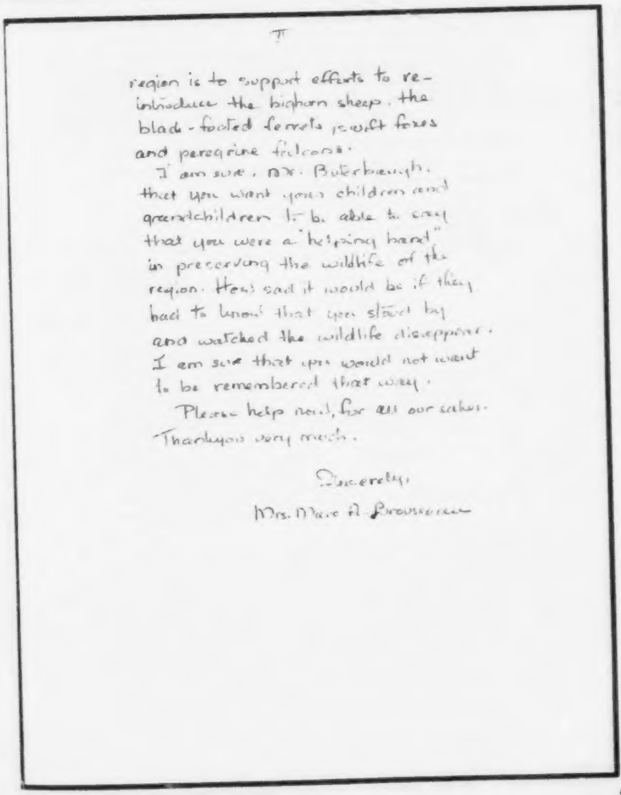
Dear Mr. Buterbaugh,

[illegible]

Predators should not be killed on the refuge to protect the livestock. The livestock should be removed [illegible] from the refuge.

The only way to insure the continuance of the wildlife in that

(over)



II

region is to support efforts to re-introduce the bighorn sheep, the black-footed ferrets, swift foxes and peregrine falcons.

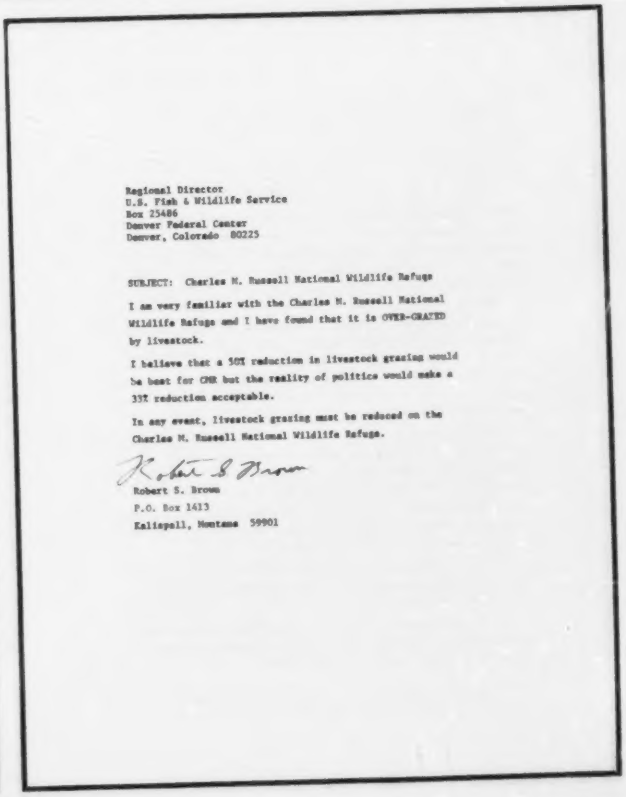
I am sure, Mr. Buterbaugh, that you want your children and grandchildren to be able to say that you were a "helping hand" in preserving the wildlife of the region. How sad it would be if they had to know that you stood by and watched the wildlife disappear. I am sure that you would not want to be remembered that way.

Please help now, for all our sakes.

Thank you very much.

Sincerely,

Mrs. Marc A. Brousseau



Regional Director
U.S. Fish & Wildlife Service
Box 25486
Denver Federal Center
Denver, Colorado 80225

SUBJECT: Charles M. Russell National Wildlife Refuge

I am very familiar with the Charles M. Russell National Wildlife Refuge and I have found that it is OVER-GRAZED by livestock.

I believe that a 50% reduction in livestock grazing would be best for CMR but the reality of politics would make a 33% reduction acceptable.

In any event, livestock grazing must be reduced on the Charles M. Russell National Wildlife Refuge.

Robert S. Brown

Robert S. Brown
P.O. Box 1413
Kalispell, Montana 59901

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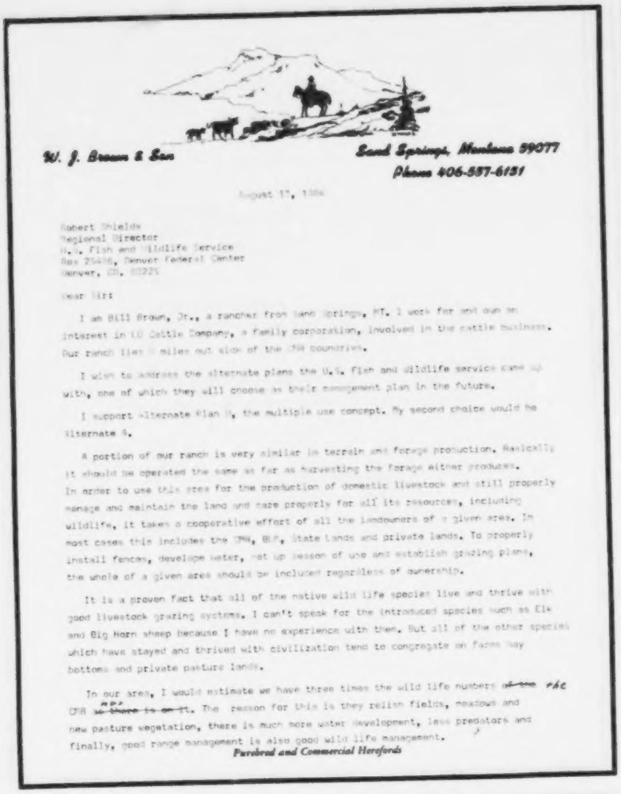


W. J. Brown & Son

Sand Springs, Montana 59077
Phone 406-557-6151

August 17, 1984

Robert Shields
Regional Director
U.S. Fish and Wildlife Service
Box 25486, Denver Federal Center
Denver, CO. 80225

Dear Sir:

I am Bill Brown, Jr., a rancher from Sand Springs, MT. I work for and own an interest in LU Cattle Company, a family corporation, involved in the cattle business. Our ranch lies [illegible] miles out side of the CMR boundries.

I wish to address the alternate plans the U.S. Fish and Wildlife service came up with, one of which they will choose as their management plan in the future.

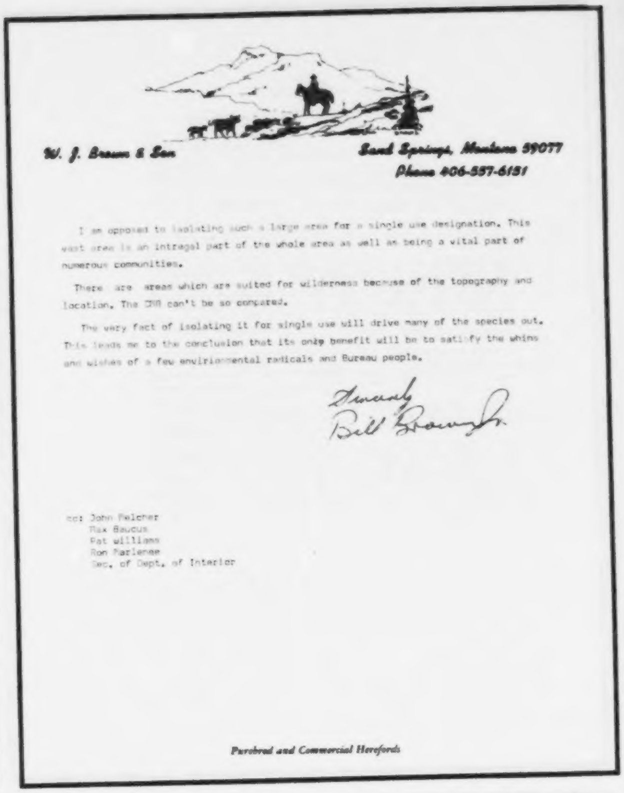
I support Alternate Plan B, the multiple use concept. My second choice would be Alternate 4.

A portion of our ranch is very similar in terrain and forage production. Basically it should be operated the same as far as harvesting the forage either produces. In order to use this area for the production of domestic livestock and still properly manage and maintain the land and care properly for all its resources, including wildlife, it takes a cooperative effort of all the landowners of a given area. In most cases this includes the CMR, BLM, State Lands and private lands. To properly install fences, develope water, set up season of use and establish grazing plans, the whole of a given area should be included regardless of ownership.

It is a proven fact that all of the native wild life species live and thrive with good livestock grazing systems. I can't speak for the introduced species such as Elk and Big Horn sheep because I have no experience with them. But all of the other species which have stayed and thrived with civilization tend to congregate on farms hay bottoms and private pasture lands.

In our area, I would estimate we have three times the wild life numbers ~~of the~~ the CMR has ~~as there is on it~~. The reason for this is they relish fields, meadows and new pasture vegetation, there is much more water development, less predators and finally, good range management is also good wild life management.

Purebred and Commercial Herefords



W. J. Brown & Son

Sand Springs, Montana 59077
Phone 406-557-6151

I am opposed to isolating such a large area for a single use designation. This vast area is an intregal part of the whole area as well as being a vital part of numerous communities.

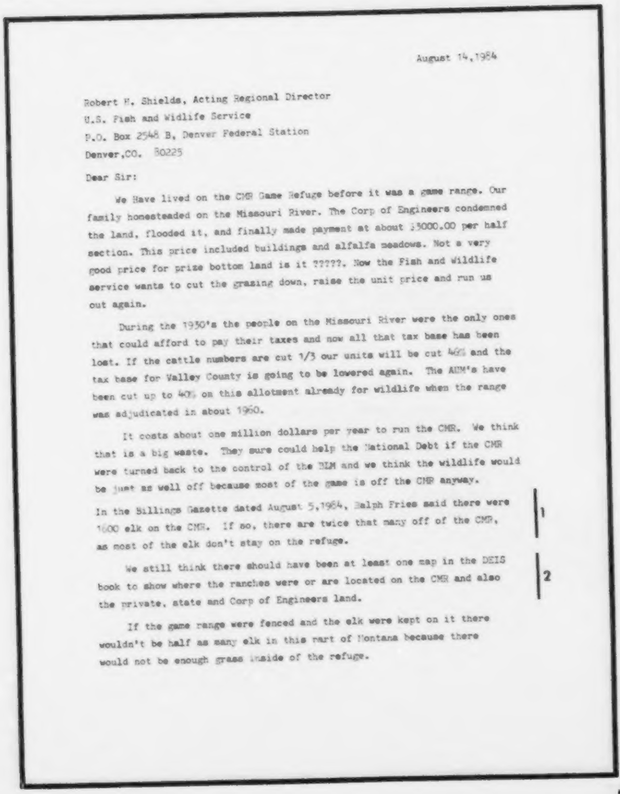
There are areas which are suited for wilderness because of the topography and location. The CMR can't be so compared.

The very fact of isolating it for single use will drive many of the species out. This leads me to the conclusion that its only benefit will be to satisfy the whims and wishes of a few envirionmental radicals and Bureau people.

Sincerely
Bill Brown Jr.

cc: John Melcher
Max Baucus
Pat williams
Ron Marlenee
Sec. of Dept. of Interior

Purebred and Commercial Herefords



August 14,1984

Robert H. Shields, Acting Regional Director
U.S. Fish and Widlife Service
P.O. Box 2548 B, Denver Federal Station
Denver,CO. 80225

Dear Sir:

We Have lived on the CMR Game Refuge before it was a game range. Our family homesteaded on the Missouri River. The Corp of Engineers condemned the land, flooded it, and finally made payment at about $5000.00 per half section. This price included buildings and alfalfa meadows. Not a very good price for prize bottom land is it ?????. Now the Fish and Wildlife service wants to cut the grazing down, raise the unit price and run us out again.

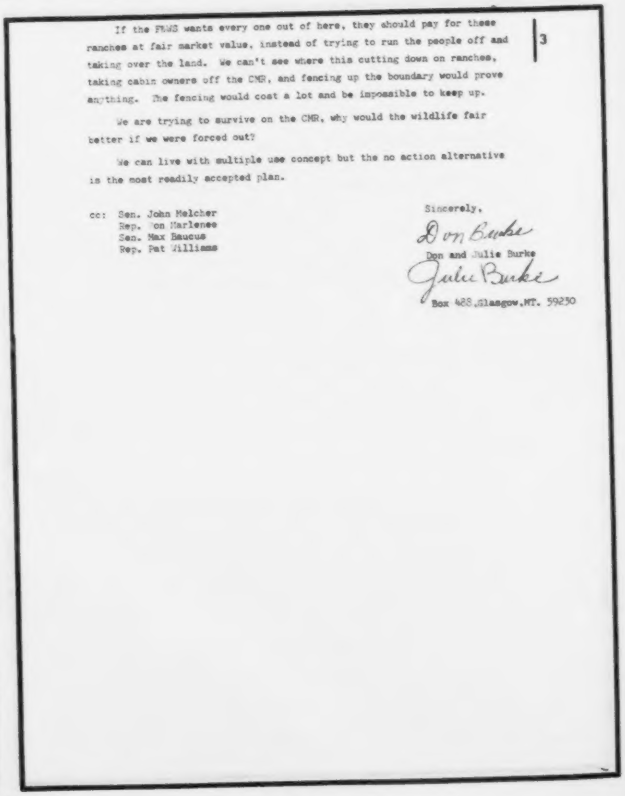
During the 1930's the people on the Missouri River were the only ones that could afford to pay their taxes and now all that tax base has been lost. If the cattle numbers are cut 1/3 our units will be cut 40% and the tax base for Valley County is going to be lowered again. The AUM's have been cut up to 40% on this allotment already for wildlife when the range was adjudicated in about 1960.

It costs about one million dollars per year to run the CMR. We think that is a big waste. They sure could help the National Debt if the CMR were turned back to the control of the BLM and we think the wildlife would be just as well off because most of the game is off the CMR anyway.

In the Billings Gazette dated August 5,1984, Ralph Fries said there were 1600 elk on the CMR. If so, there are twice that many off of the CMR, as most of the elk don't stay on the refuge. 1

We still think there should have been at least one map in the DEIS book to show where the ranches were or are located on the CMR and also the private, state and Corp of Engineers land. 2

If the game range were fenced and the elk were kept on it there wouldn't be half as many elk in this part of Montana because there would not be enough grass inside of the refuge.



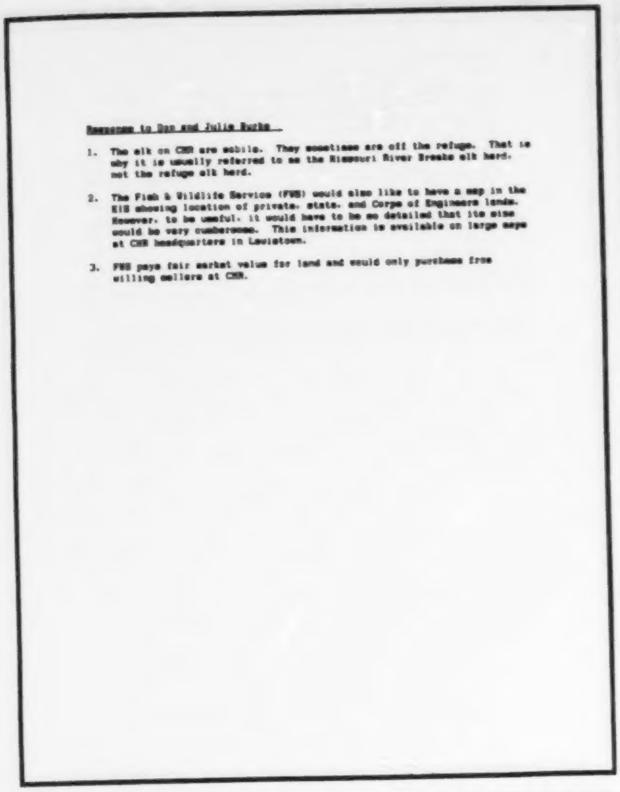
If the FWS wants every one out of here, they should pay for these ranches at fair market value, instead of trying to run the people off and taking over the land. We can't see where this cutting down on ranches, taking cabin owners off the CMR, and fencing up the boundary would prove anything. The fencing would cost a lot and be impossible to keep up. 3

We are trying to survive on the CMR, why would the wildlife fair better if we were forced out?

We can live with multiple use concept but the no action alternative is the most readily accepted plan.

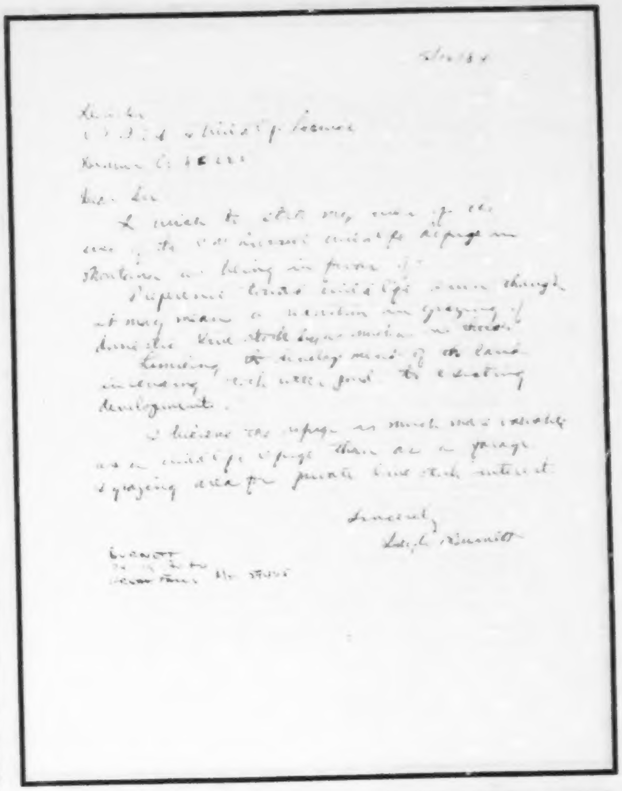
cc: Sen. John Melcher
Rep. Ron Marlenee
Sen. Max Baucus
Rep. Pat Williams

Sincerely,
Don Burke
Don and Julie Burke
Julie Burke
Box 488,Glasgow,MT. 59230



Response to Don and Julie Burke

1. The elk on CMR are mobile. They sometimes are off the refuge. That is why it is usually referred to as the Missouri River Breaks elk herd, not the refuge elk herd.
2. The Fish & Wildlife Service (FWS) would also like to have a map in the EIS showing location of private, state, and Corps of Engineers lands. However, to be useful, it would have to be so detailed that its size would be very cumbersome. This information is available on large maps at CMR headquarters in Lewistown.
3. FWS pays fair market value for land and would only purchase from willing sellers at CMR.



[illegible]

Regional Director
U.S. Fish & Wildlife Service
Denver Co 80225

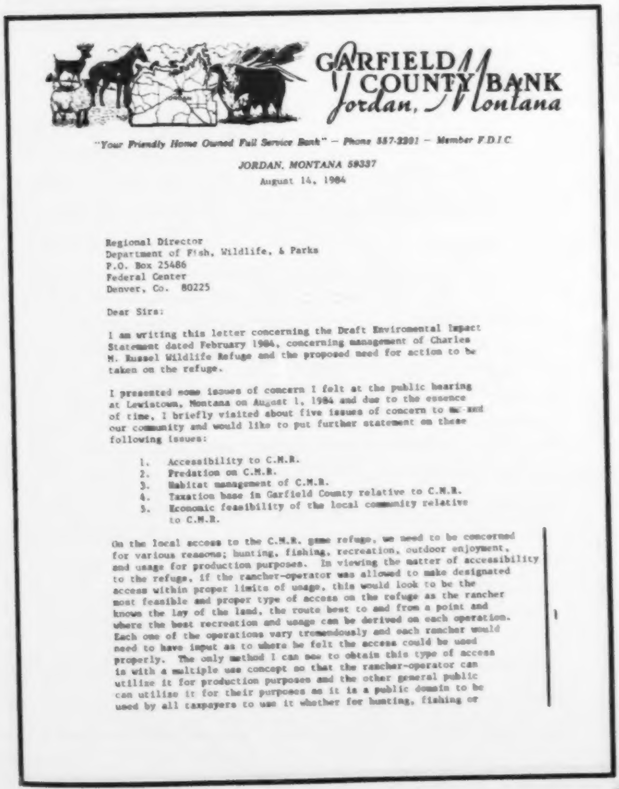
Dear Sir

I wish to state my view of the use of the C.M. Russell Wildlife Refuge in Montana as being in favor of preference towards wildlife even though it may mean a reduction in grazing of domestic live stock [illegible]. Limiting the development of the land [illegible] development.

I believe the refuge is much more valuable as a wildlife refuge than as a forage & grazing area for private live stock interest.

Sincerely,
Leigh Burnett

Burnett
[illegible]
Great Falls Mt 59405



GARFIELD COUNTY BANK
Jordan, Montana

"Your Friendly Home Owned Full Service Bank" — Phone 557-2201 — Member F.D.I.C.

JORDAN, MONTANA 59337

August 14, 1984

Regional Director
Department of Fish, Wildlife, & Parks
P.O. Box 25486
Federal Center
Denver, Co. 80225

Dear Sirs:

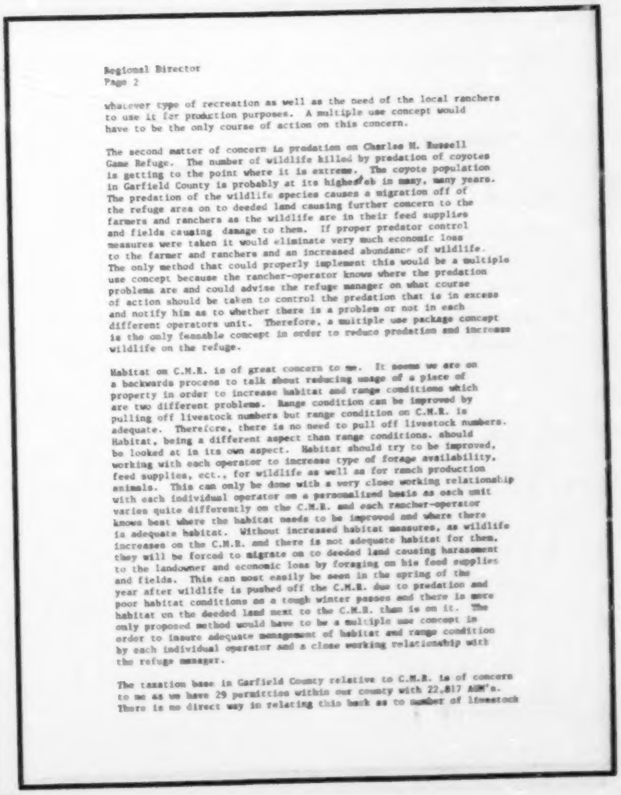
I am writing this letter concerning the Draft Enviromental Impact Statement dated February 1984, concerning management of Charles M. Russel Wildlife Refuge and the proposed need for action to be taken on the refuge.

I presented some issues of concern I felt at the public hearing at Lewistown, Montana on August 1, 1984 and due to the essence of time, I briefly visited about five issues of concern to me and our community and would like to put further statement on these following issues:

1. Accessibility to C.M.R.
2. Predation on C.M.R.
3. Habitat management of C.M.R.
4. Taxation base in Garfield County relative to C.M.R.
5. Economic feasibility of the local community relative to C.M.R.

On the local access to the C.M.R. game refuge, we need to be concerned for various reasons; hunting, fishing, recreation, outdoor enjoyment, and usage for production purposes. In viewing the matter of accessibility to the refuge, if the rancher-operator was allowed to make designated access within proper limits of usage, this would look to be the most feasible and proper type of access on the refuge as the rancher knows the lay of the land, the route best to and from a point and where the best recreation and usage can be derived on each operation. Each one of the operations vary tremendously and each rancher would need to have input as to where he felt the access could be used properly. The only method I can see to obtain this type of access is with a multiple use concept so that the rancher-operator can utilize it for production purposes and the other general public can utilize it for their purposes as it is a public domain to be used by all taxpayers to use it whether for hunting, fishing or

1



Regional Director
Page 2

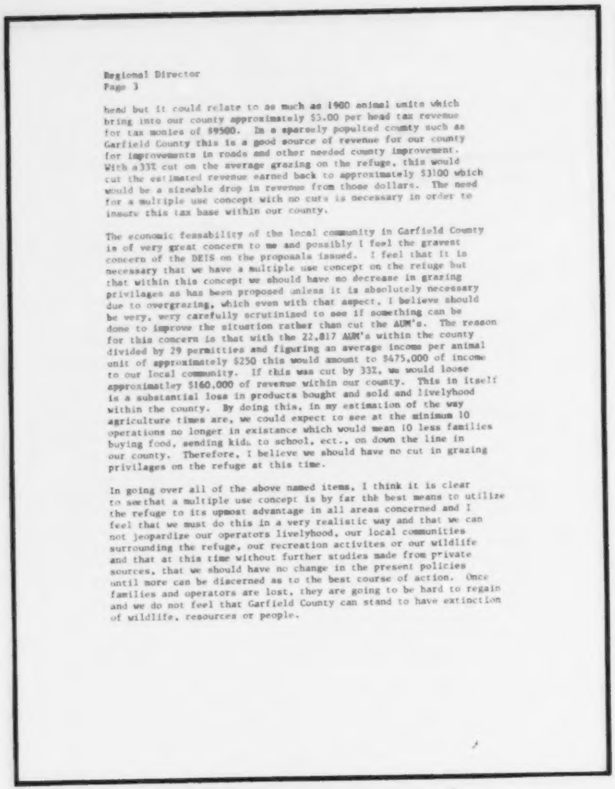
whatever type of recreation as well as the need of the local ranchers to use it for production purposes. A multiple use concept would have to be the only course of action on this concern.

The second matter of concern is predation on Charles M. Russell Game Refuge. The number of wildlife killed by predation of coyotes is getting to the point where it is extreme. The coyote population in Garfield County is probably at its highest in many, many years. The predation of the wildlife species causes a migration off of the refuge area on to deeded land causing further concern to the farmers and ranchers as the wildlife are in their feed supplies and fields causing damage to them. If proper predator control measures were taken it would eliminate very much economic loss to the farmer and ranchers and an increased abundance of wildlife. The only method that could properly implement this would be a multiple use concept because the rancher-operator knows where the predation problems are and could advise the refuge manager on what course of action should be taken to control the predation that is in excess and notify him as to whether there is a problem or not in each different operators unit. Therefore, a multiple use package concept is the only feasable concept in order to reduce predation and increase wildlife on the refuge.

Habitat on C.M.R. is of great concern to me. It seems we are on a backwards process to talk about reducing usage of a piece of property in order to increase habitat and range conditions which are two different problems. Range condition can be improved by pulling off livestock numbers but range condition on C.M.R. is adequate. Therefore, there is no need to pull off livestock numbers. Habitat, being a different aspect than range conditions, should be looked at in its own aspect. Habitat should try to be improved, working with each operator to increase type of forage availability, feed supplies, ect., for wildlife as well as for ranch production animals. This can only be done with a very close working relationship with each individual operator on a personalized basis as each unit varies quite differently on the C.M.R. and each rancher-operator knows best where the habitat needs to be improved and where there is adequate habitat. Without increased habitat measures, as wildlife increases on the C.M.R. and there is not adequate habitat for them, they will be forced to migrate on to deeded land causing harassment to the landowner and economic loss by foraging on his food supplies and fields. This can most easily be seen in the spring of the year after wildlife is pushed off the C.M.R. due to predation and poor habitat conditions as a tough winter passes and there is more habitat on the deeded land next to the C.M.R. than is on it. The only proposed method would have to be a multiple use concept in order to insure adequate management of habitat and range condition by each individual operator and a close working relationship with the refuge manager.

The taxation base in Garfield County relative to C.M.R. is of concern to me as we have 29 permittees within our county with 22,817 AUM's. There is no direct way in relating this back as to number of livestock

best copy available

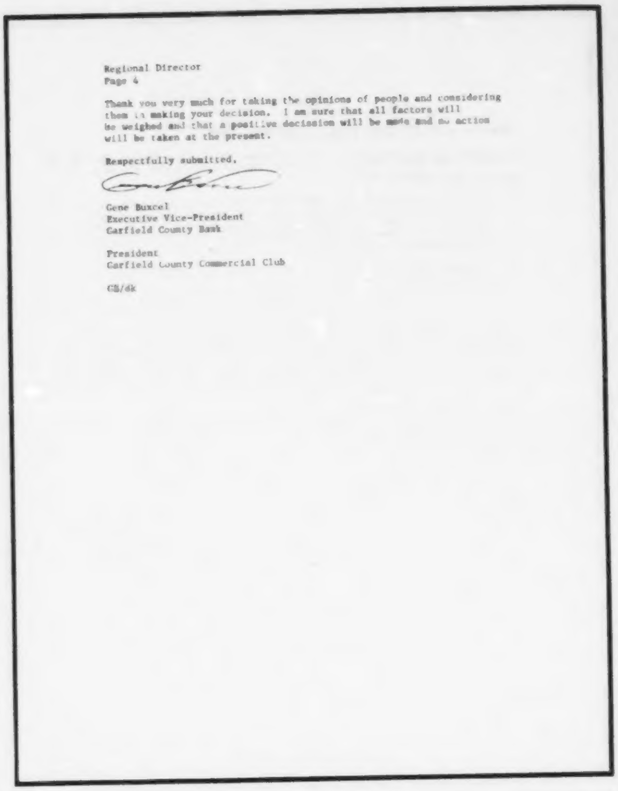


Regional Director
Page 3

head but it could relate to as much as 1900 animal units which bring into our county approximately $5.00 per head tax revenue for tax monies of $9500. In a sparsely populted county such as Garfield County this is a good source of revenue for our county for improvements in roads and other needed county improvement. With a33% cut on the average grazing on the refuge, this would cut the estimated revenue earned back to approximately $3100 which would be a sizeable drop in revenue from those dollars. The need for a multiple use concept with no cuts is necessary in order to insure this tax base within our county.

The economic feasability of the local community in Garfield County is of very great concern to me and possibly I feel the gravest concern of the DEIS on the proposals issued. I feel that it is necessary that we have a multiple use concept on the refuge but that within this concept we should have no decrease in grazing privilages as has been proposed unless it is absolutely necessary due to overgrazing, which even with that aspect, I believe should be very, very carefully scrutinized to see if something can be done to improve the situation rather than cut the AUM's. The reason for this concern is that with the 22,817 AUM's within the county divided by 29 permitties and figuring an average income per animal unit of approximately $250 this would amount to $475,000 of income to our local community. If this was cut by 33%, we would loose approximatley $160,000 of revenue within our county. This in itself is a substantial loss in products bought and sold and livelyhood within the county. By doing this, in my estimation of the way agriculture times are, we could expect to see at the minimum 10 operations no longer in existance which would mean 10 less families buying food, sending kids to school, ect., on down the line in our county. Therefore, I believe we should have no cut in grazing privilages on the refuge at this time.

In going over all of the above named items, I think it is clear to seethat a multiple use concept is by far the best means to utilize the refuge to its upmost advantage in all areas concerned and I feel that we must do this in a very realistic way and that we can not jeopardize our operators livelyhood, our local communities surrounding the refuge, our recreation activites or our wildlife and that at this time without further studies made from private sources, that we should have no change in the present policies until more can be discerned as to the best course of action. Once families and operators are lost, they are going to be hard to regain and we do not feel that Garfield County can stand to have extinction of wildlife, resources or people.



Regional Director
Page 4

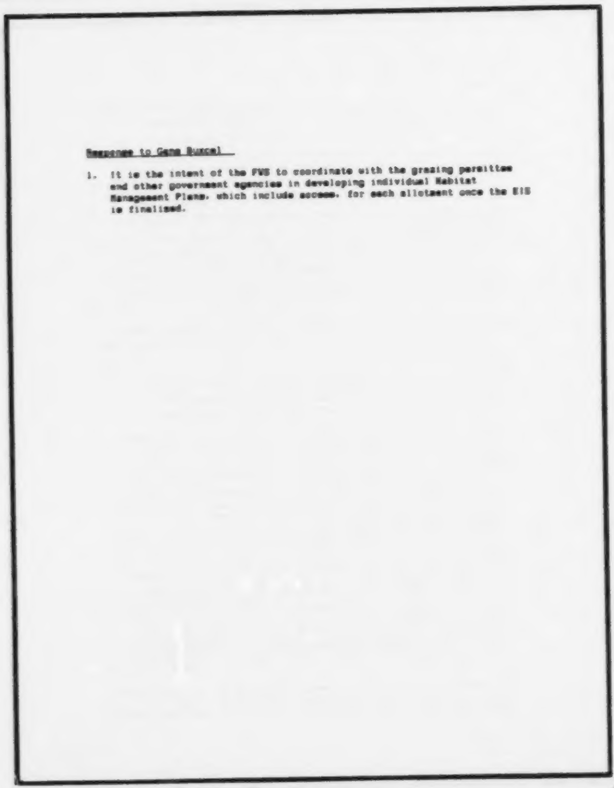
Thank you very much for taking the opinions of people and considering them in making your decision. I am sure that all factors will be weighed and that a positive decission will be made and no action will be taken at the present.

Respectfully submitted,

Gene Buxcel
Executive Vice-President
Garfield County Bank

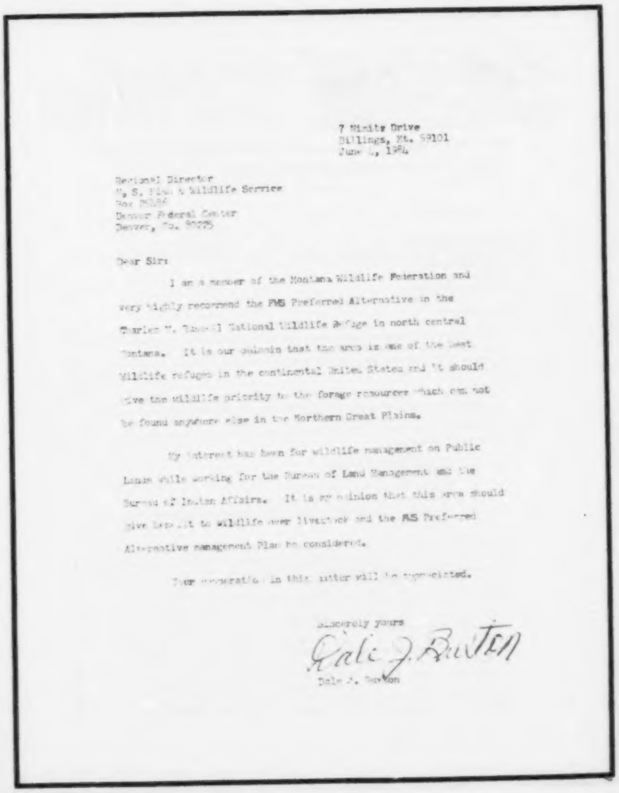
President
Garfield County Commercial Club

GB/dk



Response to Gene Buxcel

1. It is the intent of the FWS to coordinate with the grazing permittee and other government agencies in developing individual Habitat Management Plans, which include access, for each allotment once the EIS is finalized.



7 Minitz Drive
Billings, Mt. 59101
June 4, 1984

Regional Director
U. S. Fish & Wildlife Service
Box 25486
Denver Federal Center
Denver, Co. 80225

Dear Sir:

I am a member of the Montana Wildlife Federation and very highly recommend the FWS Preferred Alternative on the Charles M. Russell National Wildlife Refuge in north central Montana. It is our opinoin that the area is one of the best wildlife refuges in the continental United States and it should give the wildlife priority to the forage resources which can not be found anywhere else in the Northern Great Plains.

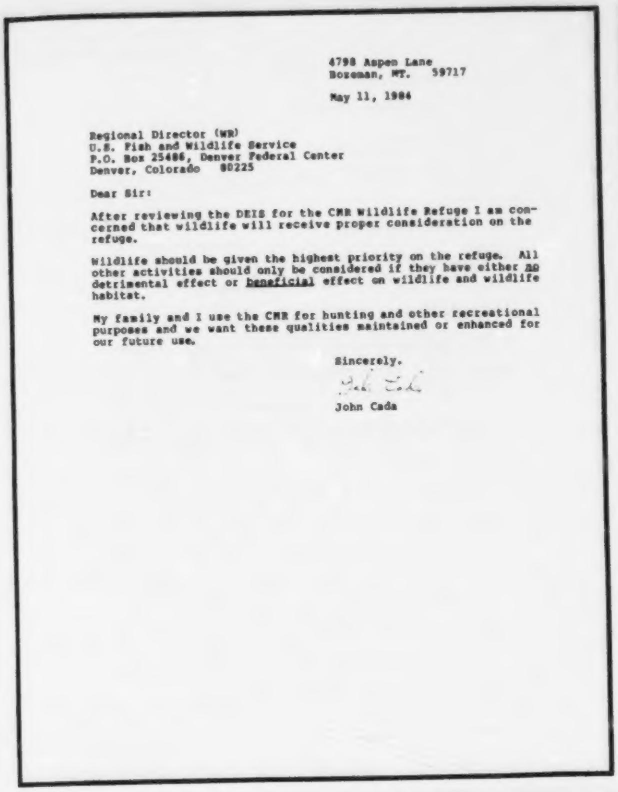
My interest has been for wildlife management on Public Lands while working for the Bureau of Land Management and the Bureau of Indian Affairs. It is my opinion that this area should give benefit to wildlife over livestock and the FWS Preferred Alternative management Plan be considered.

Your cooperation in this matter will be appreciated.

Sincerely yours

Dale J. Burton

Dale J. Burton



4798 Aspen Lane
Bozeman, MT. 59717

May 11, 1984

Regional Director (WR)
U.S. Fish and Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, Colorado 80225

Dear Sir:

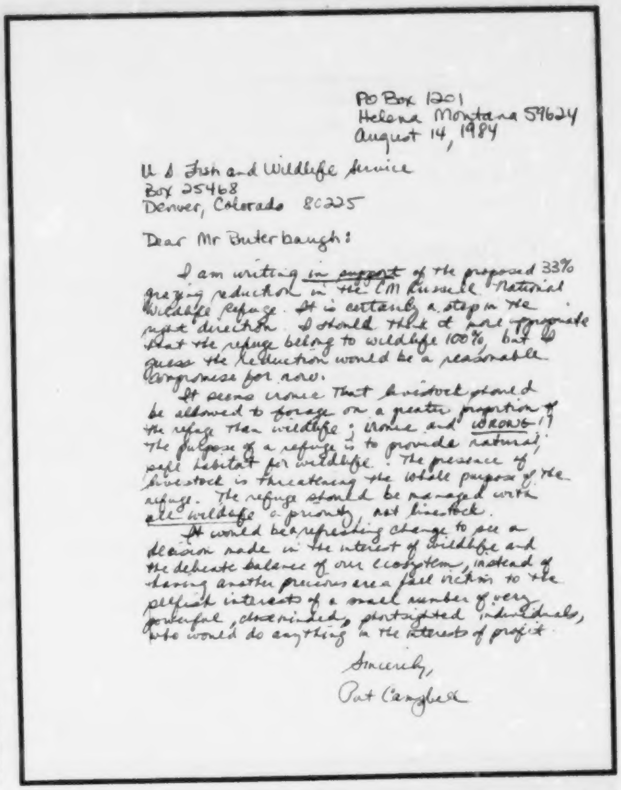
After reviewing the DEIS for the CMR Wildlife Refuge I am concerned that wildlife will receive proper consideration on the refuge.

Wildlife should be given the highest priority on the refuge. All other activities should only be considered if they have either no detrimental effect or beneficial effect on wildlife and wildlife habitat.

My family and I use the CMR for hunting and other recreational purposes and we want these qualities maintained or enhanced for our future use.

Sincerely.

John Cada



PO Box 1201
Helena Montana 59624
August 14, 1984

U S Fish and Wildlife Service
Box 25468
Denver, Colorado 80225

Dear Mr Buterbaugh:

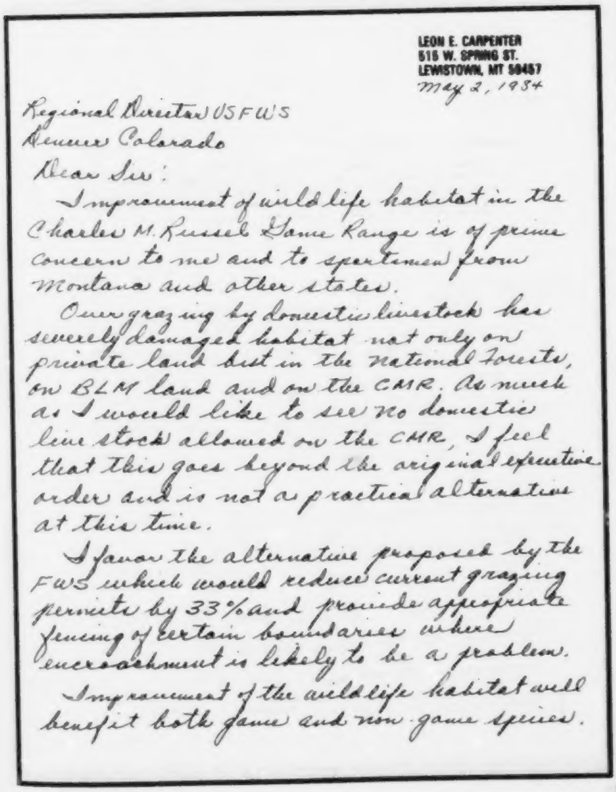
I am writing in support of the proposed 33% grazing reduction in the CM Russell National Wildlife Refuge. It is certainly a step in the right direction. I should think it more appropriate that the refuge belong to wildlife 100%, but I guess the reduction would be a reasonable compromise for now.

It seems ironic that livestock should be allowed to forage on a greater proportion of the refuge than wildlife; ironic and WRONG!! The purpose of a refuge is to provide natural, safe habitat for wildlife. The presence of livestock is threatening the whole purpose of the refuge. The refuge should be managed with all wildlife a priority, not livestock.

It would be a refreshing change to see a decision made in the interest of wildlife and the delicate balance of our ecosystem, instead of having another precious area fall victim to the selfish interests of a small number of very powerful, closeminded, shortsighted individuals, who would do anything in the interests of profit.

Sincerely,

Pat Campbell



LEON E. CARPENTER
515 W. SPRING ST.
LEWISTOWN, MT 59457
May 2, 1984

Regional Director USFWS
Denver Colorado

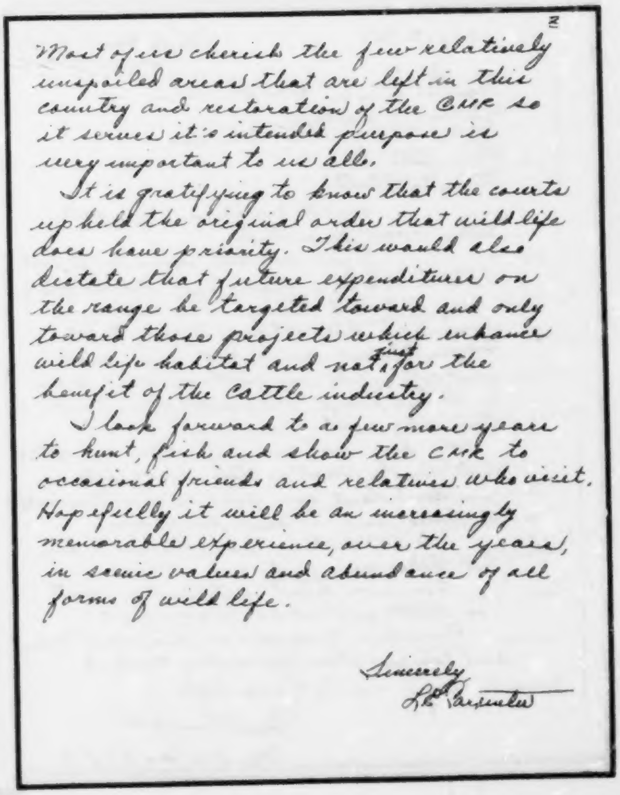
Dear Sir:

Improvement of wild life habitat in the Charles M. Russel Game Range is of prime concern to me and to sportsmen from Montana and other states.

Overgrazing by domestic livestock has severely damaged habitat not only on private land but in the National Forests, on BLM land and on the CMR. As much as I would like to see no domestic live stock allowed on the CMR, I feel that this goes beyond the original executive order and is not a practical alternative at this time.

I favor the alternative proposed by the FWS which would reduce current grazing permits by 33% and provide appropriate fencing of certain boundaries where encroachment is likely to be a problem.

Improvement of the wildlife habitat will benefit both game and non-game species.



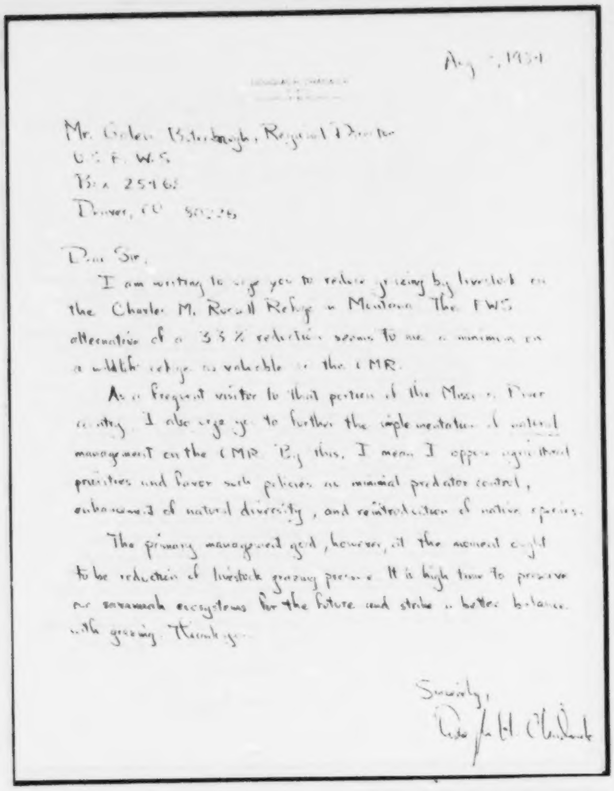
2

Most of us cherish the few relatively unspoiled areas that are left in this country and restoration of the CMR so it serves it's intended purpose is very important to us all.

It is gratifying to know that the courts upheld the original order that wild life does have priority. This would also dictate that future expenditures on the range be targeted toward and only toward those projects which enhance wild life habitat and not just for the benefit of the Cattle industry.

I look forward to a few more years to hunt, fish and show the CMR to occasional friends and relatives who visit. Hopefully it will be an increasingly memorable experience, over the years, in scenic values and abundance of all forms of wild life.

Sincerely
L E Carpenter



Aug [illegible], 1984

Mr. Galen Buterbaugh, Regional Director
U.S.F.W.S
Box 25486
Denver, CO 80225

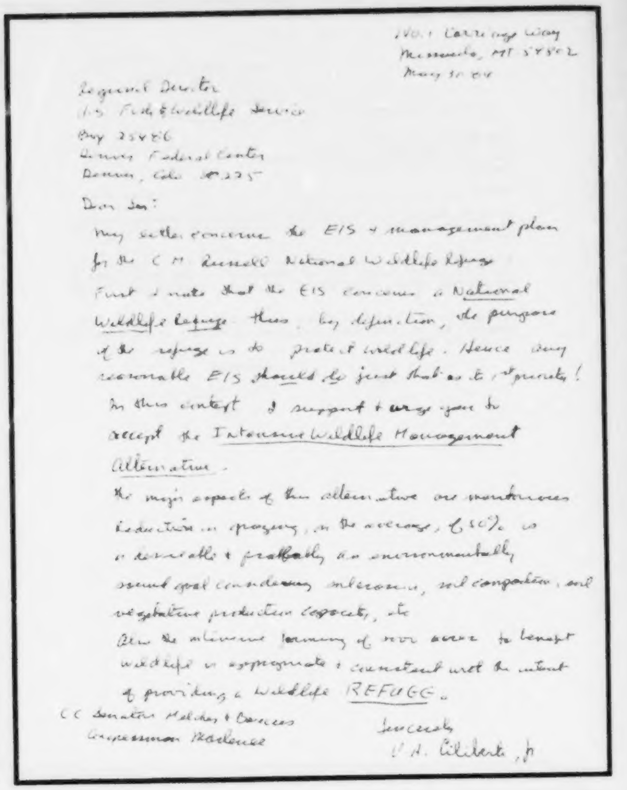
Dear Sir,

I am writing to urge you to reduce grazing by livestock on the Charles M. Russell Refuge in Montana. The FWS alternative of a 33% reduction seems to me a minimum on a wildlife refuge as valuable as the CMR.

As a frequent visitor to that portion of the Missouri River country, I also urge you to further the implementation of natural management on the CMR. By this, I mean I oppose agricultural practices and favor such policies as minimal predator control, enhancement of natural diversity, and reintroduction of native species.

The primary management goal, however, at the moment ought to be reduction of livestock grazing pressure. It is high time to preserve our savannah ecosystems for the future and strike a better balance with grazing. Thank you.

Sincerely,



No. 1 Carriage Way
Missoula, MT 59802
May 30 84

Regional Director
U.S. Fish & Wildlife Service
Box 25486
Denver Federal Center
Denver, Colo 80225

Dear Sir:

My letter concerns the EIS + management plan for the C M Russell National Wildlife Refuge.

First I note that the EIS concerns a National Wildlife Refuge; thus, by definition, the purpose of the refuge is to protect wildlife. Hence any reasonable EIS should do just that as its 1st priority!

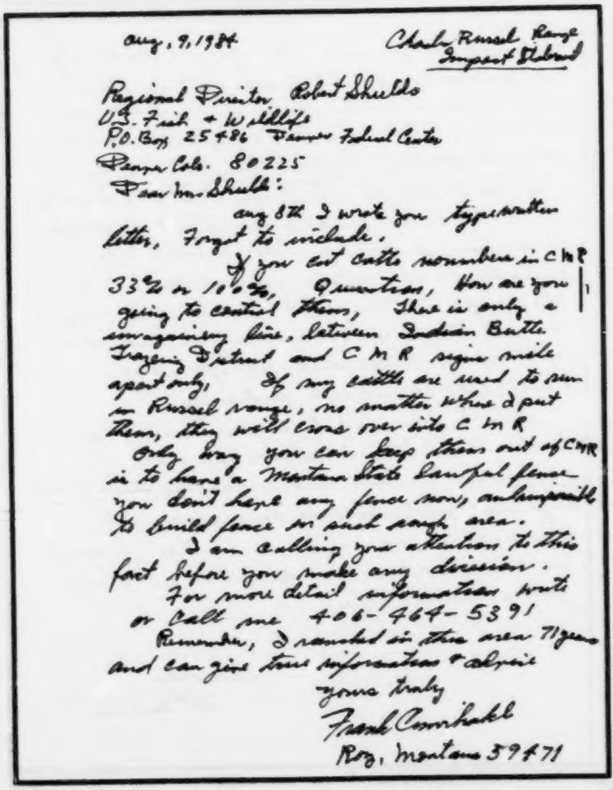
In this context I support + urge you to accept the Intensive Wildlife Management Alternative.

The major aspects of this alternative are [illegible] reduction in grazing, on the average, of 50% is a reasonable + probably an environmentally sound goal considering soil erosion, soil compaction, and vegetative production capacity, etc.

Also the minimum farming of river areas to benefit wildlife is appropriate + consistent with the intent of providing a Wildlife REFUGE.

cc Senators Melcher + Baucus
Congressman Marlenee

Sincerely
V.A. Ciliberti, Jr



Aug. 9, 1984

Charles Russel Range Impact Statement

Regional Director Robert Shields
U.S. Fish + Wildlife
P.O. Box 25486 Denver Federal Center
Denver Colo. 80225

Dear Mr. Shields:

Aug 8th I wrote you typewritten letter, Forget to include.

If you cut cattle number in CMR 33% or 100%, Question, How are you going to control them, There is only a imaginary line, between Indian Butte Grazing District and CMR nine mile apart only, If my cattle are used to run in Russel range, no matter where I put them, they will cross over into CMR 1

Only way you can keep them out of CMR is to have a Montana State lawful fence you don't have any fence now, and impossible to build fence in such rough area.

I am calling your attention to this fact before you make any decision.

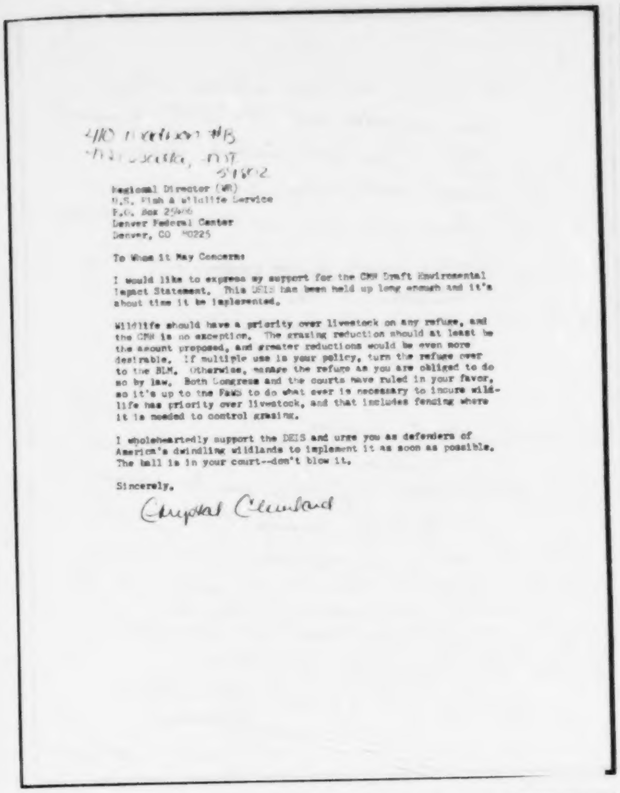
For more detail information write or call me 406-464-5391

Remember, I ranched in this area 71 years and can give true information + advice

Yours truly
Frank Cimrhakl
Roy, Montana 59471

Response to Frank Cimrhakl:

1. If this becomes a problem, it is possible to fence along a section of the boundary although it may be difficult. Other methods of controlling livestock to certain areas would be to negotiate with the permittee the use of salt blocks, management of water via location, riding, etc., to eliminate the problem.



410 [illegible] #B
Missoula, MT
59802

Regional Director (WR)
U.S. Fish & Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, CO 80225

To Whom it May Concern:

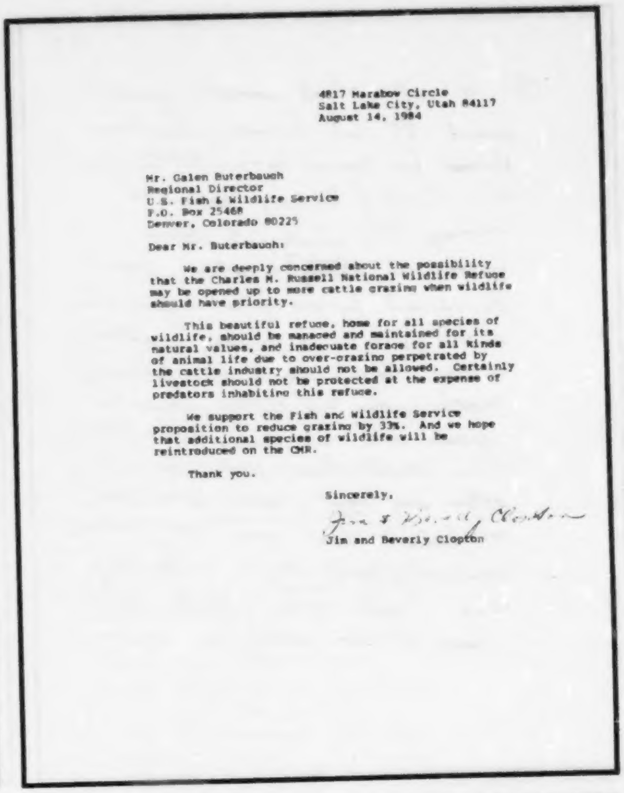
I would like to express my support for the CMR Draft Environmental Impact Statement. This DEIS has been held up long enough and it's about time it be implemented.

Wildlife should have a priority over livestock on any refuge, and the CMR is no exception. The grazing reduction should at least be the amount proposed, and greater reductions would be even more desirable. If multiple use is your policy, turn the refuge over to the BLM. Otherwise, manage the refuge as you are obliged to do so by law. Both Congress and the courts have ruled in your favor, so it's up to the FWS to do what ever is necessary to insure wildlife has priority over livestock, and that includes fencing where it is needed to control grazing.

I wholeheartedly support the DEIS and urge you as defenders of America's dwindling wildlands to implement it as soon as possible. The ball is in your court--don't blow it.

Sincerely,

Crystal Cleveland



4817 Marabow Circle
Salt Lake City, Utah 84117
August 14, 1984

Mr. Galen Buterbaugh
Regional Director
U.S. Fish & Wildlife Service
P.O. Box 25468
Denver, Colorado 80225

Dear Mr. Buterbaugh:

We are deeply concerned about the possibility that the Charles M. Russell National Wildlife Refuge may be opened up to more cattle grazing when wildlife should have priority.

This beautiful refuge, home for all species of wildlife, should be managed and maintained for its natural values, and inadequate forage for all kinds of animal life due to over-grazing perpetrated by the cattle industry should not be allowed. Certainly livestock should not be protected at the expense of predators inhabiting this refuge.

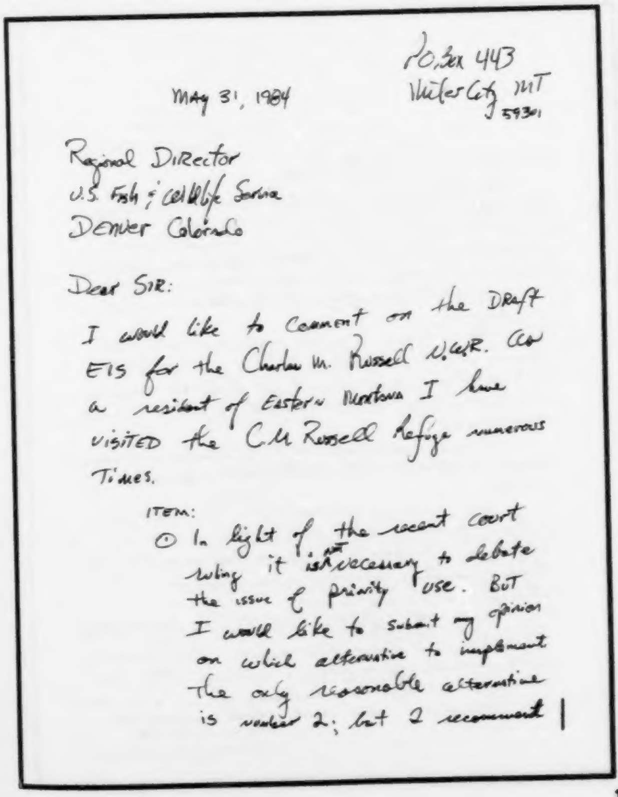
We support the Fish and Wildlife Service proposition to reduce grazing by 33%. And we hope that additional species of wildlife will be reintroduced on the CMR.

Thank you.

Sincerely,

Jim & Beverly Clopton

Jim and Beverly Clopton



P.O. Box 443
Miles City MT
59301

May 31, 1984

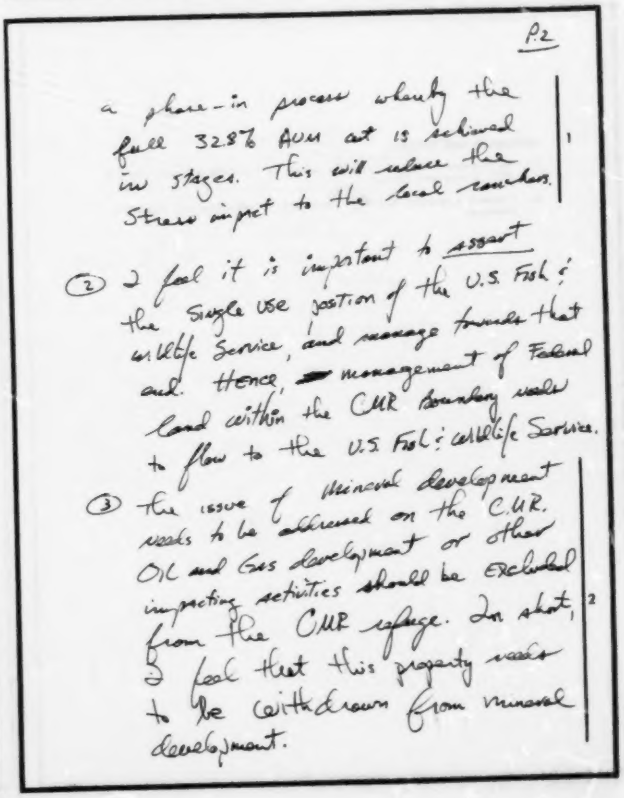
Regional Director
U.S. Fish & Wildlife Service
Denver Colorado

Dear Sir:

I would like to comment on the Draft EIS for the Charles M. Russell N.W.R. As a resident of Eastern Montana I have visited the C.M Russell Refuge numerous times.

ITEM:

① In light of the recent court ruling it is not necessary to debate the issue of priority use. But I would like to submit my opinion on which alternative to implement. The only reasonable alternative is number 2; but I recommend

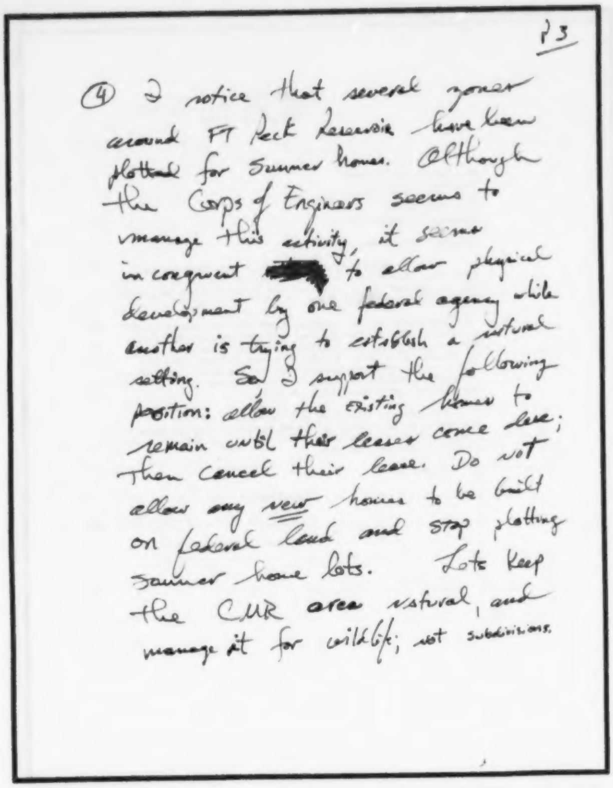


P.2

a phase-in process whereby the full 32.8% AUM cut is achieved in stages. This will reduce the stress impact to the local ranchers. 1

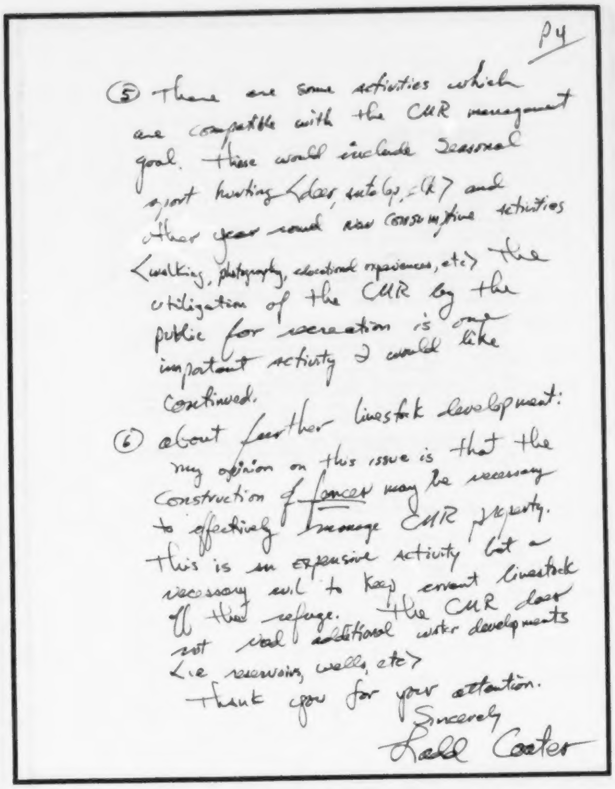
② I feel it is important to assert the single use position of the U.S. Fish & Wildlife Service, and manage towards that end. Hence, management of Federal land within the CMR boundary needs to flow to the U.S. Fish & Wildlife Service.

③ The issue of mineral development needs to be addressed on the C.M.R. Oil and Gas development or other impacting activities should be excluded from the CMR refuge. In short, I feel that this property needs to be withdrawn from mineral development. 2



P3

④ I notice that several zones around FT Peck Reservoir have been plotted for Summer homes. Although the Corps of Engineers seems to manage this activity, it seems incongruent [redacted] to allow physical development by one federal agency while another is trying to establish a natural setting. So I support the following position: allow the existing homes to remain until their leases come due; then cancel their lease. Do not allow any new houses to be built on federal land and stop plotting summer home lots. Lets keep the CMR area natural, and manage it for wildlife; not subdivisions.



P4

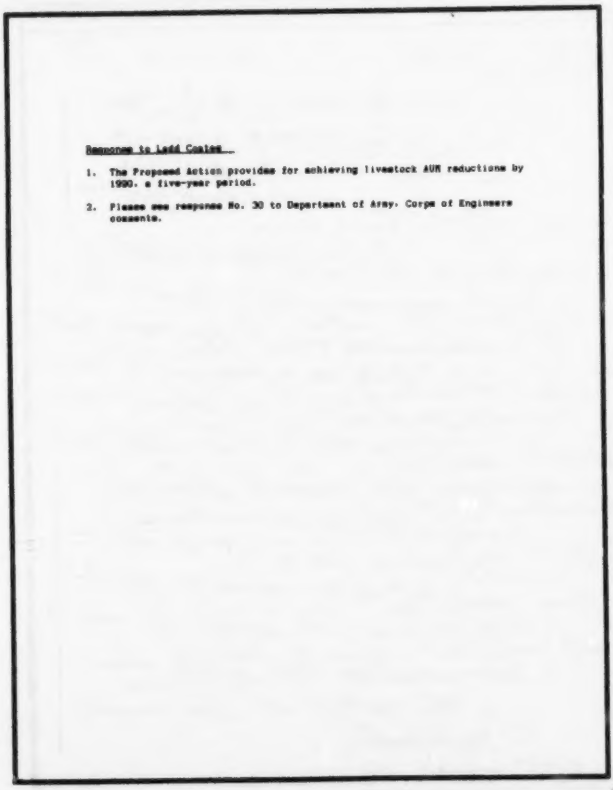
⑤ There are some activities which are compatible with the CMR management goal. these would include seasonal sport hunting <deer, antelope, elk> and other year round non consumptive activities <walking, photography, educational experiences, etc> the utilization of the CMR by the public for recreation is one important activity I would like continued.

⑥ about further livestock development: my opinion on this issue is that the construction of fences may be necessary to effectively manage CMR property. this is an expensive activity but a necessary evil to keep errant livestock off the refuge. the CMR does not need additional water developments <ie reservoirs, wells, etc>

Thank you for your attention.

Sincerely

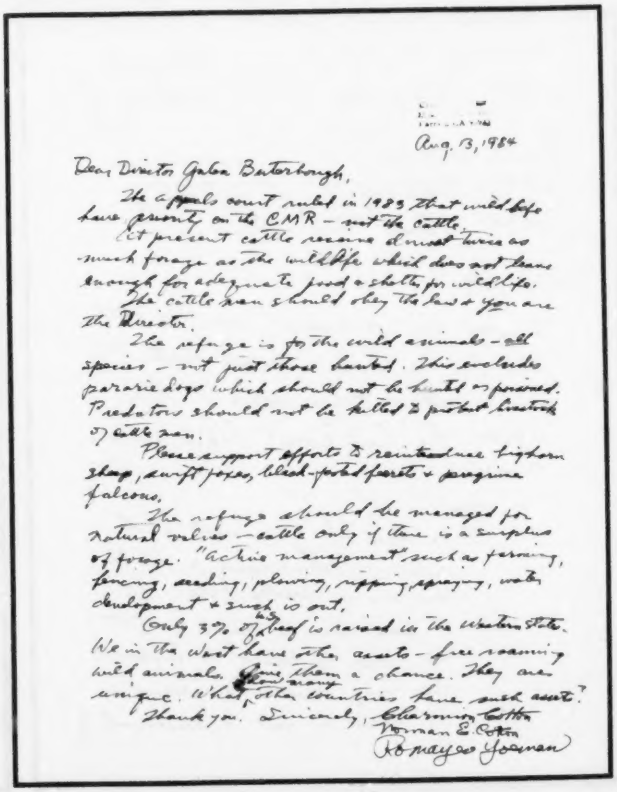
Ladd Coates



Response to Ladd Coates

1. The Proposed Action provides for achieving livestock AUM reductions by 1990, a five-year period.

2. Please see response No. 30 to Department of Army, Corps of Engineers comments.



Aug. 13, 1984

Dear Director Galen Buterbaugh,

The appeals court ruled in 1983 that wildlife have priority on the CMR – not the cattle.

At present cattle receive almost twice as much forage as the wildlife which does not leave enough for adequate food & shelter for wildlife.

The cattle men should obey the law & you are the Director.

The refuge is for the wild animals – all species – not just those hunted. This includes prairie dogs which should not be hunted or poisoned. Predators should not be killed to protect livestock of cattle men.

Please support efforts to reintroduce bighorn sheep, swift foxes, black-footed ferrets & peregrine falcons.

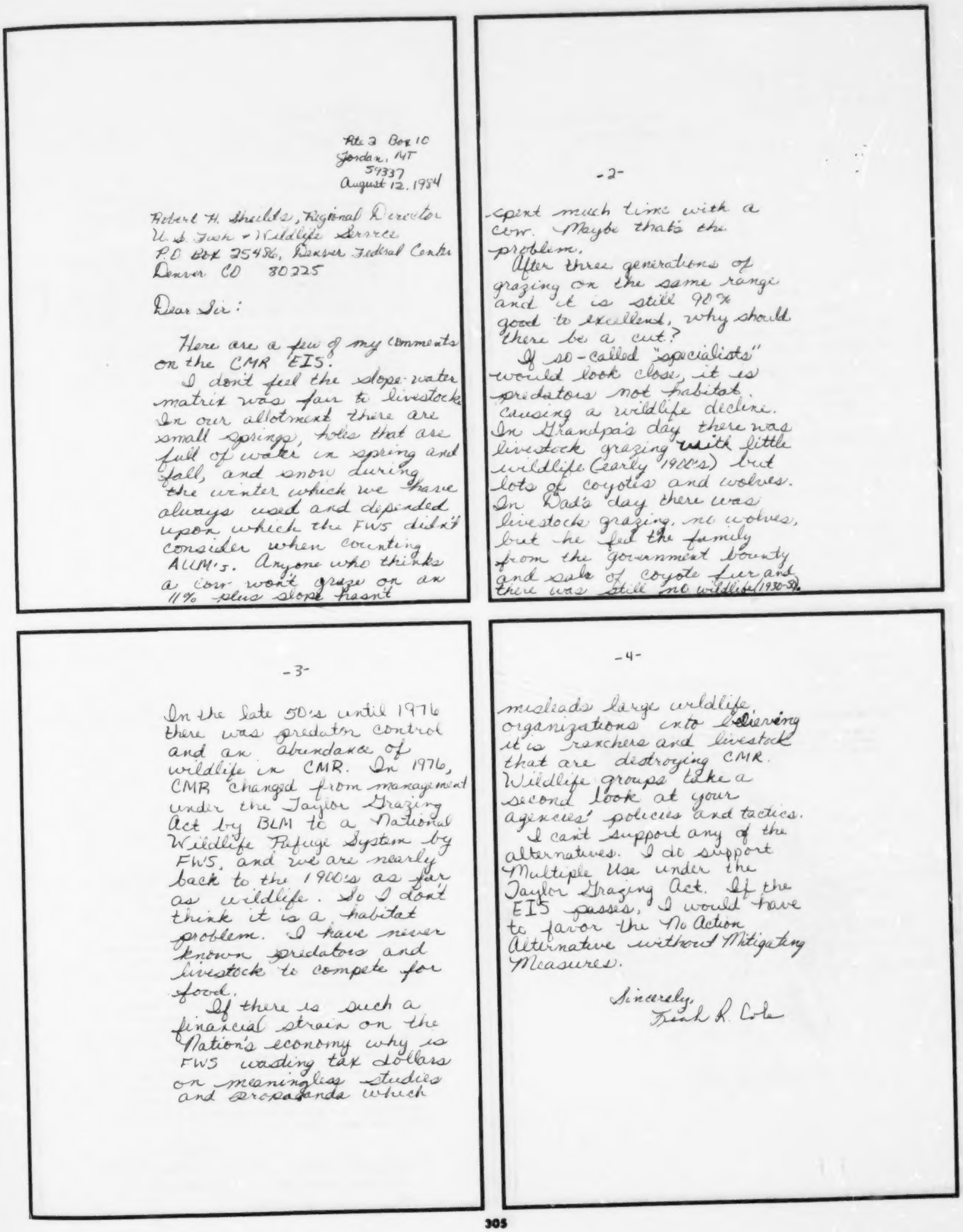
The refuge should be managed for natural values – cattle only if there is a surplus of forage. "Active management" such as farming, fencing, seeding, plowing, ripping, spraying, water development & such is out.

Only 3% of U.S. beef is raised in the Western States. We in the West have other assets – free roaming wild animals. Give them a chance. They are unique. What how many other countries have such assets?

Thank you. Sincerely, Charmion Cotton

Norman E. Cotton

Romayne Yeoman



Rte 3 Box 10
Jordan, MT
59337
August 12, 1984

Robert H. Shields, Regional Director
U.S. Fish + Wildlife Service
P.O Box 25486, Denver Federal Center
Denver CO 80225

Dear Sir:

Here are a few of my comments on the CMR EIS.

I don't feel the slope-water matrix was fair to livestock. In our allotment there are small springs, holes that are full of water in spring and fall, and snow during the winter which we have always used and depended upon which the FWS didn't consider when counting AUM's. Anyone who thinks a cow won't graze on an 11% plus slope hasn't

-2-

spent much time with a cow. Maybe that's the problem.

After three generations of grazing on the same range and it is still 90% good to excellent, why should there be a cut?

If so-called "specialists" would look close, it is predators not habitat causing a wildlife decline. In Grandpa's day there was livestock grazing with little wildlife (early 1900's) but lots of coyotes and wolves. In Dad's day there was livestock grazing, no wolves, but he fed the family from the government bounty and sale of coyote fur and there was still no wildlife (1930-50).

-3-

In the late 50's until 1976 there was predator control and an abundance of wildlife in CMR. In 1976, CMR changed from management under the Taylor Grazing Act by BLM to a National Wildlife Refuge System by FWS, and we are nearly back to the 1900's as far as wildlife. So I don't think it is a habitat problem. I have never known predators and livestock to compete for food.

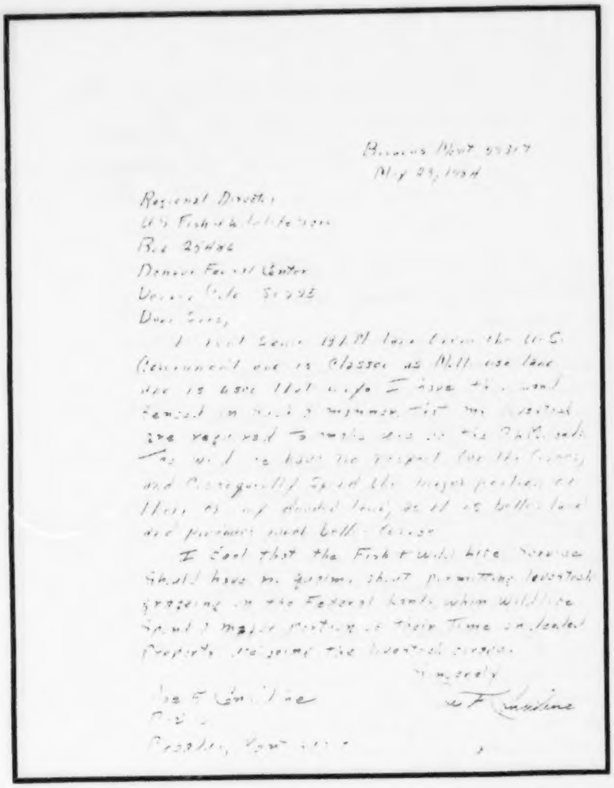
If there is such a financial strain on the Nation's economy why is FWS wasting tax dollars on meaningless studies and propaganda which

-4-

misleads large wildlife organizations into believing it is ranchers and livestock that are destroying CMR. Wildlife groups take a second look at your agencies' policies and tactics.

I can't support any of the alternatives. I do support Multiple Use under the Taylor Grazing Act. If the EIS passes, I would have to favor the No Action Alternative without Mitigating Measures.

Sincerely,
Frank R. Cole



Broadus Mont 59317
May 23, 1984

Regional Director
US Fish & Wildlife Service
Box 25486
Denver Federal Center
Denver Colo 80225

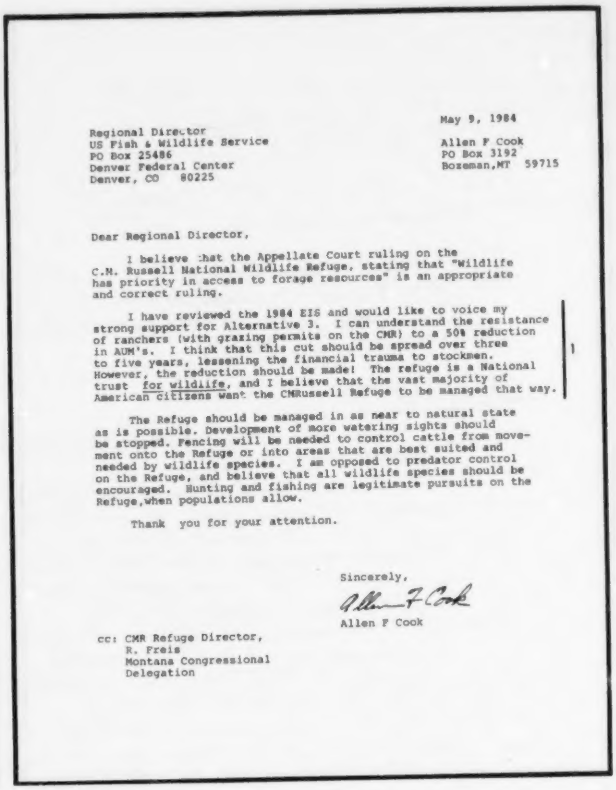
Dear Sirs,

I lease some BLM land from the U.S. Government and is classed as BLM use land and is used that way. I have this land fenced in such a manner that my livestock are required to make use of the BLM land. The wildlife have no respect for the fences, and consequently spend the major portion of their time on my deeded land, as it is better land and produces much better forage.

I feel that the Fish & Wildlife Service should have no qualms about permitting livestock grazing on the Federal lands when wildlife spend a major portion of their time on deeded property [illegible] the livestock grazing.

Sincerely

Joe F [illegible]
[illegible]
Broadus, Mont 59317



Regional Director
US Fish & Wildlife Service
PO Box 25486
Denver Federal Center
Denver, CO 80225

May 9, 1984

Allen F Cook
PO Box 3192
Bozeman,MT 59715

Dear Regional Director,

I believe that the Appellate Court ruling on the C.M. Russell National Wildlife Refuge, stating that "Wildlife has priority in access to forage resources" is an appropriate and correct ruling.

I have reviewed the 1984 EIS and would like to voice my strong support for Alternative 3. I can understand the resistance of ranchers (with grazing permits on the CMR) to a 50% reduction in AUM's. I think that this cut should be spread over three to five years, lessening the financial trauma to stockmen. However, the reduction should be made! The refuge is a National trust for wildlife, and I believe that the vast majority of American citizens want the CMRussell Refuge to be managed that way. 1

The Refuge should be managed in as near to natural state as is possible. Development of more watering sights should be stopped. Fencing will be needed to control cattle from movement onto the Refuge or into areas that are best suited and needed by wildlife species. I am opposed to predator control on the Refuge, and believe that all wildlife species should be encouraged. Hunting and fishing are legitimate pursuits on the Refuge,when populations allow.

Thank you for your attention.

Sincerely,

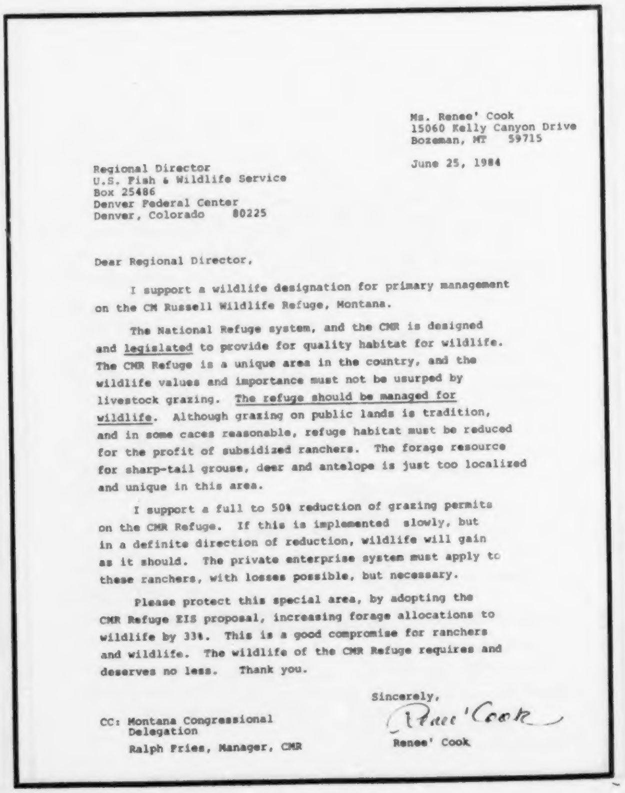
Allen F Cook

Allen F Cook

cc: CMR Refuge Director,
R. Freis
Montana Congressional
Delegation

Response to Allen F. Cook

1. We agree. The Fish & Wildlife Service proposes to spread livestock reductions over several years to lessen impacts on those permittees taking the reductions.



Ms. Renee' Cook
15060 Kelly Canyon Drive
Bozeman, MT 59715

June 25, 1984

Regional Director
U.S. Fish & Wildlife Service
Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Regional Director,

I support a wildlife designation for primary management on the CM Russell Wildlife Refuge, Montana.

The National Refuge system, and the CMR is designed and legislated to provide for quality habitat for wildlife. The CMR Refuge is a unique area in the country, and the wildlife values and importance must not be usurped by livestock grazing. The refuge should be managed for wildlife. Although grazing on public lands is tradition, and in some caces reasonable, refuge habitat must be reduced for the profit of subsidized ranchers. The forage resource for sharp-tail grouse, deer and antelope is just too localized and unique in this area.

I support a full to 50% reduction of grazing permits on the CMR Refuge. If this is implemented slowly, but in a definite direction of reduction, wildlife will gain as it should. The private enterprise system must apply to these ranchers, with losses possible, but necessary.

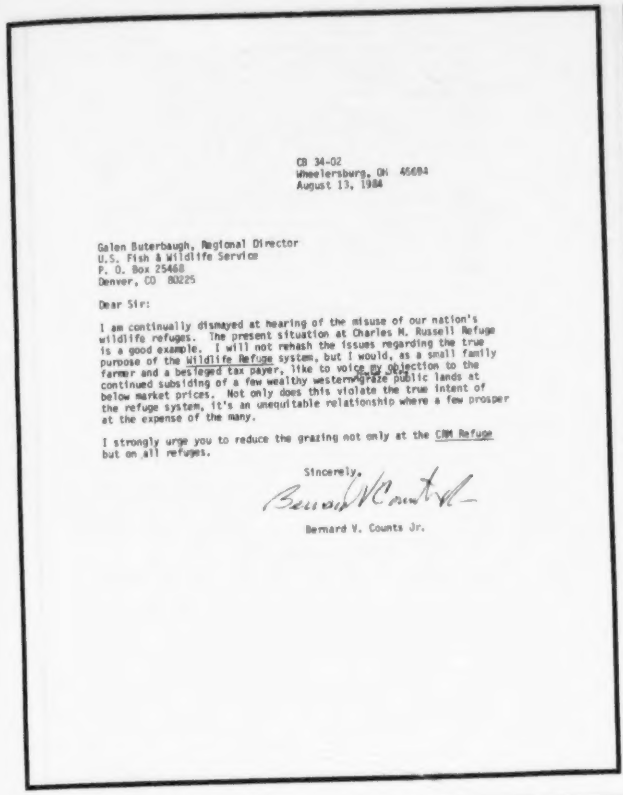
Please protect this special area, by adopting the CMR Refuge EIS proposal, increasing forage allocations to wildlife by 33%. This is a good compromise for ranchers and wildlife. The wildlife of the CMR Refuge requires and deserves no less. Thank you.

Sincerely,

Renee' Cook

Renee' Cook

CC: Montana Congressional
Delegation
Ralph Fries, Manager, CMR



CB 34-02
Wheelersburg, OH 45694
August 13, 1984

Galen Buterbaugh, Regional Director
U.S. Fish & Wildlife Service
P. O. Box 25468
Denver, CO 80225

Dear Sir:

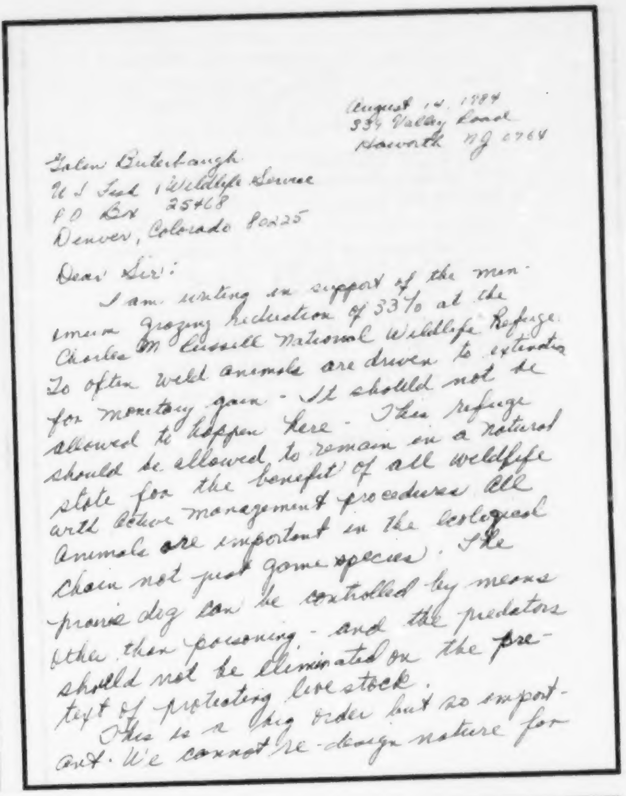
I am continually dismayed at hearing of the misuse of our nation's wildlife refuges. The present situation at Charles M. Russell Refuge is a good example. I will not rehash the issues regarding the true purpose of the Wildlife Refuge system, but I would, as a small family farmer and a besieged tax payer, like to voice my objection to the continued subsiding of a few wealthy western graze public lands at below market prices. Not only does this violate the true intent of the refuge system, it's an unequitable relationship where a few prosper at the expense of the many.

I strongly urge you to reduce the grazing not only at the CRM Refuge but on all refuges.

Sincerely,

Bernard V Counts Jr.

Bernard V. Counts Jr.



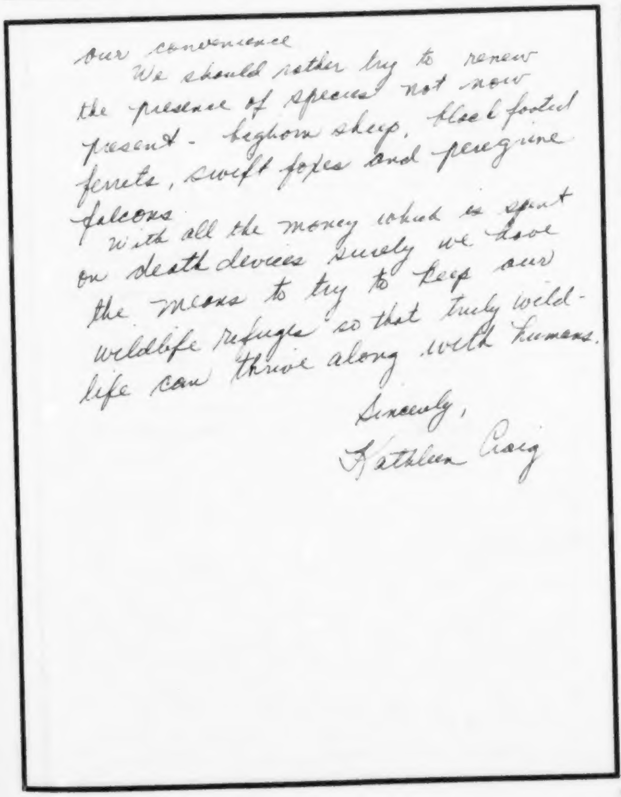
August 14, 1984
334 Valley Road
Haworth NJ 0764

Galen Buterbaugh
U S Fish & Wildlife Service
P O Box 25468
Denver, Colorado 80225

Dear Sir:

I am writing in support of the minimum grazing reduction of 33% at the Charles M Russell National Wildlife Refuge. To often wild animals are driven to extinction for monetary gain - It should not be allowed to happen here. This refuge should be allowed to remain in a natural state for the benefit of all wildlife with active management procedures. All animals are important in the ecological chain not just game species. The prairie dog can be controlled by means other than poisoning - and the predators should not be eliminated on the pretext of protecting livestock.

This is a big order but so important. We cannot re-design nature for



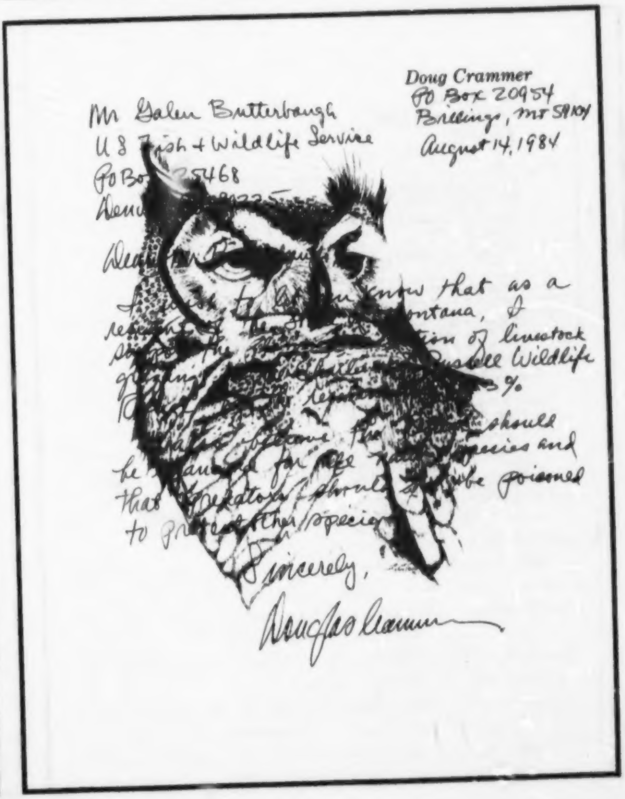
our convenience.

We should rather try to renew the presence of species not now present - bighorn sheep, black footed ferrets, swift foxes and peregrine falcons.

With all the money which is spent on death devices surely we have the means to try to keep our wildlife refuges so that truly wild-life can thrive along with humans.

Sincerely,

Kathleen Craig



Doug Crammer
PO Box 20954
Billings, MT 59104
August 14, 1984

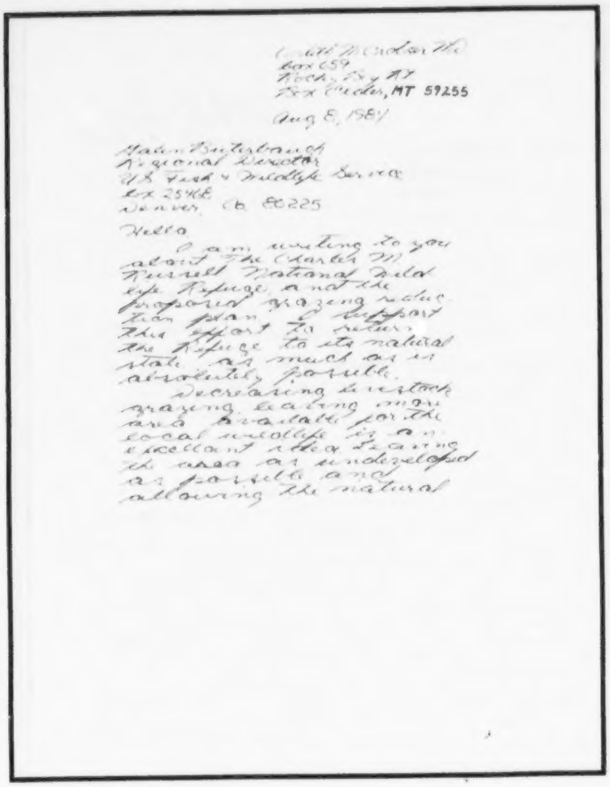
Mr Galen Butterbaugh
U S Fish + Wildlife Service
PO Box 25468
Denv[illegible] 80225

Dear Mr [illegible]

[illegible] know that as a
[illegible] Montana, I
[illegible] tion of livestock
[illegible] Russell Wildlife
[illegible] %
[illegible] should
[illegible] species and
be [illegible] for [illegible]
that predators should [illegible] be poisoned
to protect other species.

Sincerely,

Douglas Crammer



[illegible]
Box 659
Rocky Boy Rt
Box Elder, MT 59255

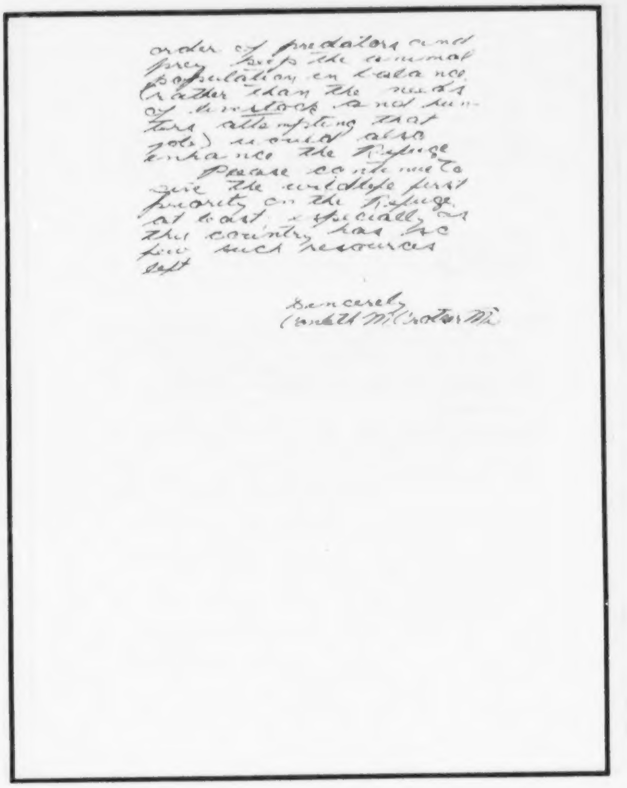
Aug 8, 1984

Galen Buterbaugh
Regional Director
U.S. Fish & Wildlife Service
Box 25486
Denver, Co 80225

Hello

I am writing to you about the Charles M. Russell National Wildlife Refuge and the proposed grazing reduction plan. I support this effort to return the Refuge to its natural state as much as is absolutely possible.

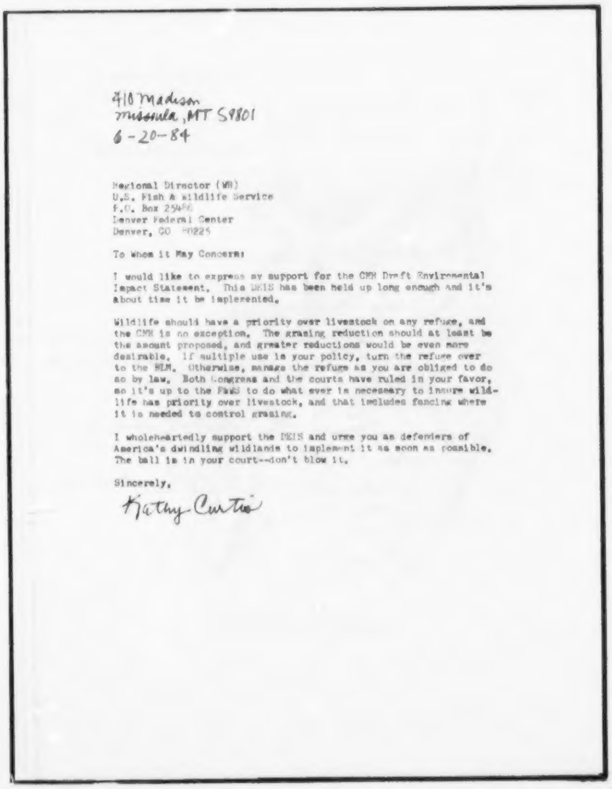
Decreasing livestock grazing leaving more area available for the local wildlife is an excellant idea leaving the area as undeveloped as possible and allowing the natural



order of predators and prey keeps the animal population in balance (rather than the needs of livestock and hunters attempting that role) would also enhance the Refuge.

Please continue to give the wildlife first priority on the Refuge at least, especially as this country has so few such resources left.

Sincerely



410 Madison
Missoula, MT 59801
6-20-84

Regional Director (WR)
U.S. Fish & Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, CO 80225

To Whom it May Concern:

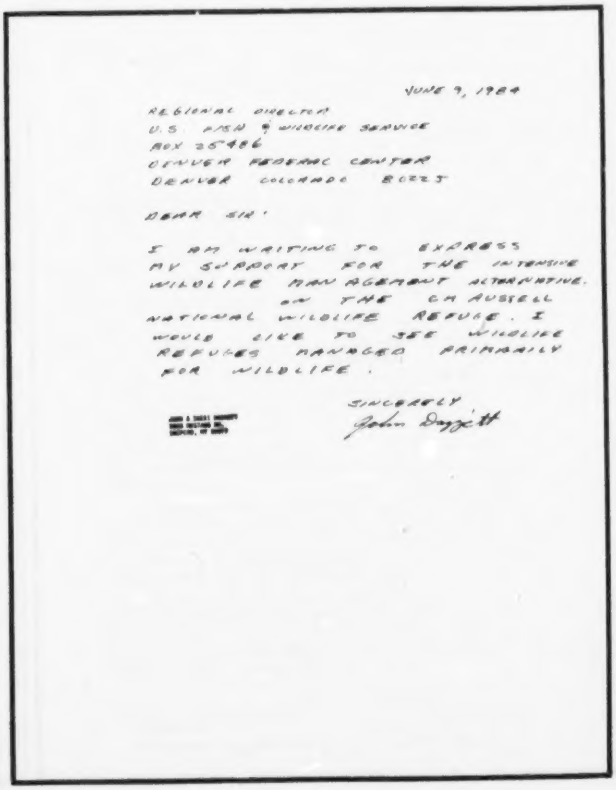
I would like to express my support for the CMR Draft Environmental Impact Statement. This DEIS has been held up long enough and it's about time it be implemented.

Wildlife should have a priority over livestock on any refuge, and the CMR is no exception. The grazing reduction should at least be the amount proposed, and greater reductions would be even more desirable. If multiple use is your policy, turn the refuge over to the BLM. Otherwise, manage the refuge as you are obliged to do so by law. Both Congress and the courts have ruled in your favor, so it's up to the FWS to do what ever is necessary to insure wildlife has priority over livestock, and that includes fencing where it is needed to control grazing.

I wholeheartedly support the DEIS and urge you as defenders of America's dwindling wildlands to implement it as soon as possible. The ball is in your court--don't blow it.

Sincerely,

Kathy Curtis



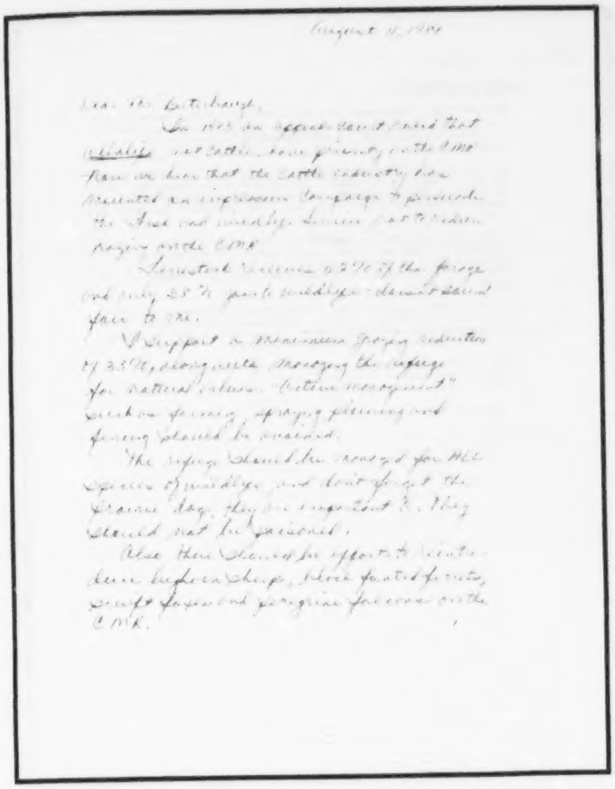
JUNE 9, 1984

REGIONAL DIRECTOR
U.S. FISH & WILDLIFE SERVICE
BOX 25486
DENVER FEDERAL CENTER
DENVER COLORADO 80225

DEAR SIR:

I AM WRITING TO EXPRESS MY SUPPORT FOR THE INTENSIVE WILDLIFE MANAGEMENT ALTERNATIVE. ON THE CM RUSSELL NATIONAL WILDLIFE REFUGE. I WOULD LIKE TO SEE WILDLIFE REFUGES MANAGED PRIMARILY FOR WILDLIFE.

SINCERELY
John Daggett


August 11, 1984

Dear Mr. Butterbaugh,

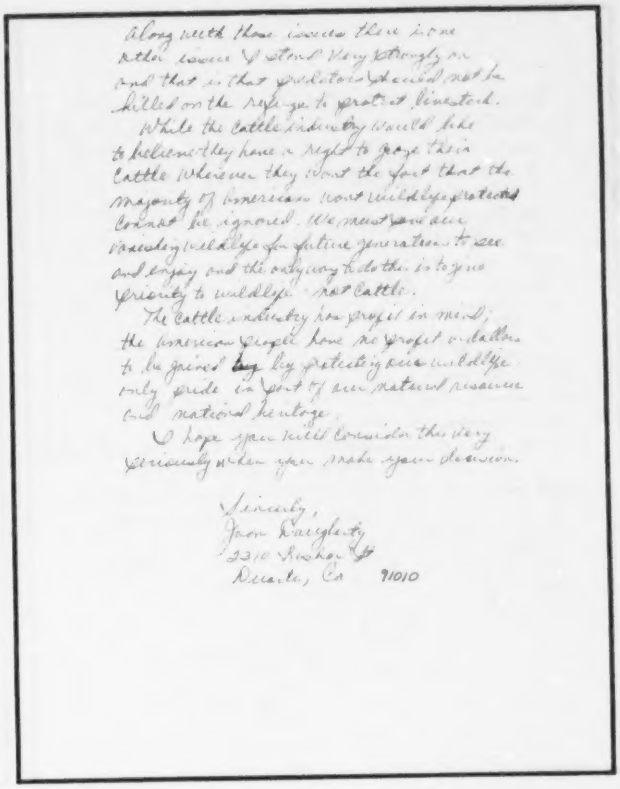
In 1983 an appeals court ruled that wildlife not cattle have priority on the CMR. Now we hear that the cattle industry has mounted an impressive campaign to persuade the Fish and Wildlife Service not to reduce grazing on the CMR.

Livestock receives 63% of the forage and only 35% goes to wildlife - doesn't sound fair to me.

I support a minimum grazing reduction of 33%, along with managing the refuge for natural values. "Active management" such as farming, spraying, plowing and fencing should be avoided.

The refuge should be managed for ALL species of wildlife, and don't forget the prairie dogs, they are important to. They should not be poisoned.

Also there should be efforts to reintroduce bighorn sheep, black footed ferrets, swift foxes and peregrine falcons on the CMR.

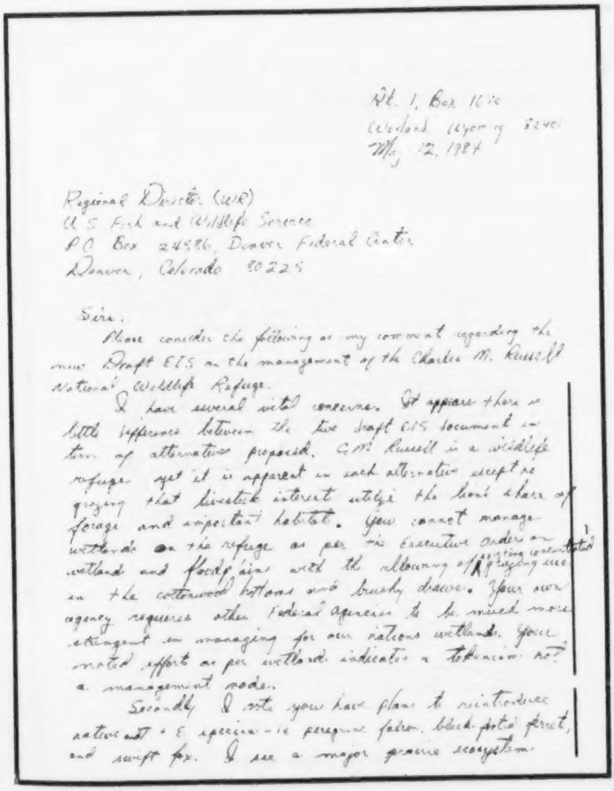

Along with these issues there is one other issue I stand very strongly on and that is that predators should not be killed on the refuge to protect livestock.

While the cattle industry would like to believe they have a right to graze their cattle wherever they want the fact that the majority of Americans want wildlife protected cannot be ignored. We must save our vanishing wildlife for future generations to see and enjoy and the only way to do this is to give priority to wildlife - not cattle.

The cattle industry has profit in mind; the American people have no profit or dollars to be gained ~~by~~ by protecting our wildlife only pride in part of our natural resource and national heritage.

I hope you will consider this very seriously when you make your decision.

Sincerely,
Joan Daugherty
2310 Rusher St
Duarte, Ca 91010


Rt. 1, Box 16c
Worland, Wyoming 82401
May 12, 1984

Regional Director (WR)
U.S. Fish and Wildlife Service
P.O. Box 24586, Denver Federal Center
Denver, Colorado 80225

Sirs:

Please consider the following as my comment regarding the new Draft EIS on the management of the Charles M. Russell National Wildlife Refuge.

I have several vital concerns. It appears there is little difference between the two draft EIS document in term of alternatives proposed. C.M. Russell is a wildlife refuge yet it is apparent in each alternative except no grazing that livestock interests utilize the lion's share of forage and important habitat. You cannot manage wetlands on the refuge as per the Executive Orders on wetlands and floodplains with the allowing of existing concentrated grazing use in the cottonwood bottoms and brushy draws. Your own agency requires other Federal Agencies to be much more stringent in managing for our nations wetlands. Your noted effort as per wetlands indicates a tokenism not a management mode. 1

Secondly I note you have plans to reintroduce native and T + E species - ie peregrine falcon, black-footed ferret, and swift fox. I see a major prairie ecosystem

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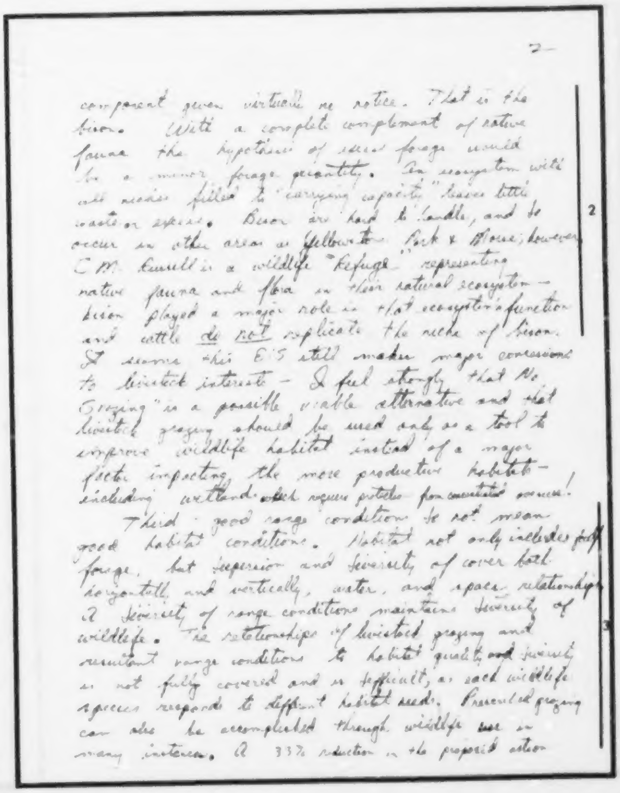
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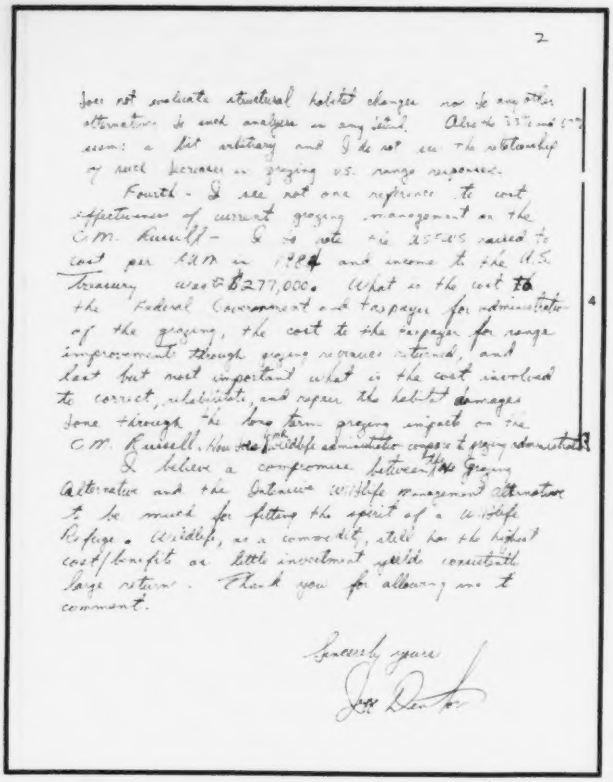
component given virtually no notice. That is the bison. With a complete complement of native fauna the hypothesis of excess forage would be a minor forage quantity. An ecosystem with all niches filled to "carrying capacity" leaves little waste or excess. Bison are hard to handle, and do occur in other areas as Yellowstone Park & Moise; however C.M. Russell is a wildlife "Refuge" representing native fauna and flora in their natural ecosystem - bison played a major role in that ecosystem's function and cattle do not replicate the niche of bison. 2

It seems this EIS still makes major concessions to livestock interests - I feel strongly that "No Grazing" is a possible viable alternative and that livestock grazing should be used only as a tool to improve wildlife habitat instead of a major factor impacting the more productive habitats - including wetlands which require protection from concentrated overuse!

Third: good range condition do not mean good habitat conditions. Habitat not only includes food/forage, but dispersion and diversity of cover both horizontally and vertically, water, and space relationships. A diversity of range conditions maintains diversity of wildlife. The relationships of livestock grazing and resultant range conditions to habitat quality and diversity is not fully covered and is difficult, as each wildlife species responds to different habitat needs. Prescribed grazing can also be accomplished through wildlife use in many instances. A 33% reduction in the proposed action 3



2

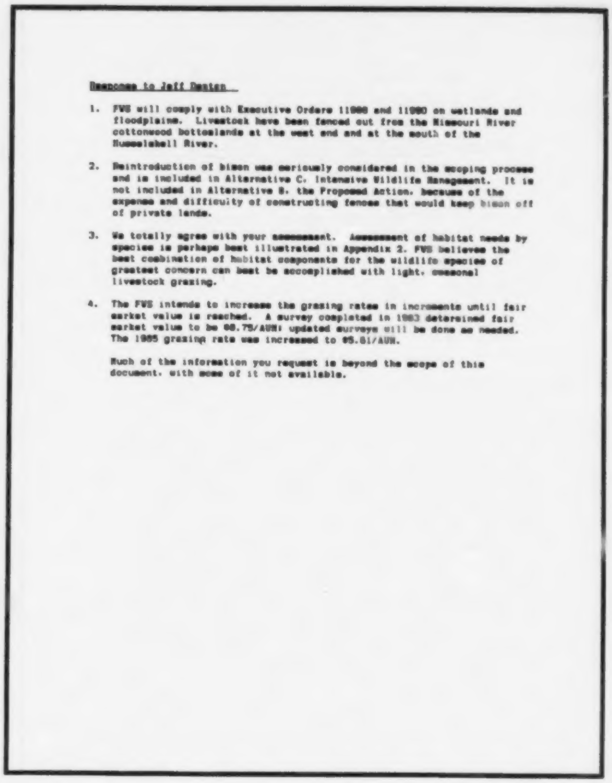
does not evaluate structural habitat changes nor do any other alternatives do such analyses in any detail. Also the 33% and 67% seem a bit arbitrary and I do not see the relationship of such decreases in grazing vs. range responses.

Fourth - I see not one reference to cost effectiveness of current grazing management on the C.M. Russell - I do note the $2.50 US raised to cost per AUM in 1984 and income to the U.S. Treasury was $277,000. What is the cost to the Federal Government and taxpayer for administration of the grazing, the cost to the taxpayer for range improvements through grazing revenues returned, and last but most important what is the cost involved to correct, rehabilitate, and repair the habitat damages done through the long term grazing impacts on the C.M. Russell. How does the wildlife administration compare to grazing administration? 4

I believe a compromise between the Grazing Alternative and the Intensive Wildlife Management Alternative to be much for fitting the spirit of a Wildlife Refuge. Wildlife, as a commodity, still has the highest cost/benefit as little investment yields consistently large returns. Thank you for allowing me to comment.

Sincerely yours

Jeff Denton



Response to Jeff Denton

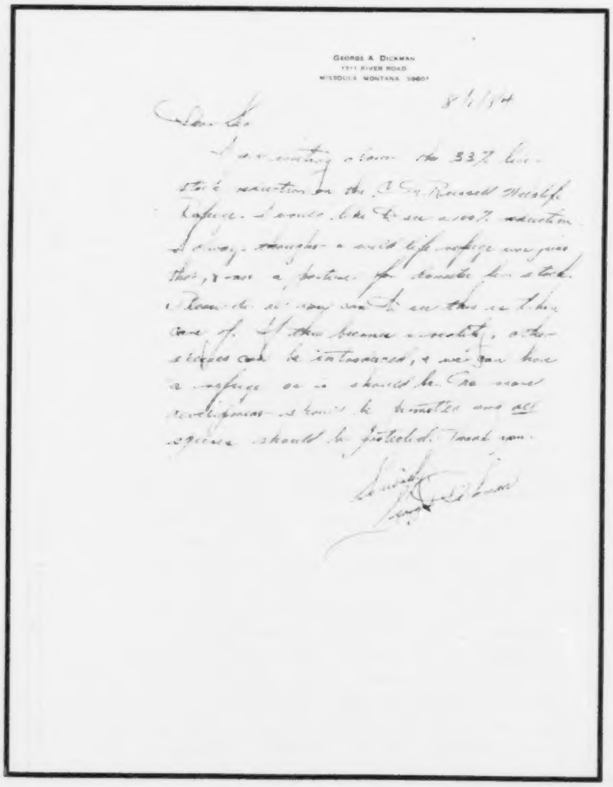
1. FWS will comply with Executive Orders 11988 and 11990 on wetlands and floodplains. Livestock have been fenced out from the Missouri River cottonwood bottomlands at the west end and at the mouth of the Musselshell River.

2. Reintroduction of bison was seriously considered in the scoping process and is included in Alternative C, Intensive Wildlife Management. It is not included in Alternative B, the Proposed Action, because of the expense and difficulty of constructing fences that would keep bison off of private lands.

3. We totally agree with your assessment. Assessment of habitat needs by species is perhaps best illustrated in Appendix 2. FWS believes the best combination of habitat components for the wildlife species of greatest concern can best be accomplished with light, seasonal livestock grazing.

4. The FWS intends to increase the grazing rates in increments until fair market value is reached. A survey completed in 1983 determined fair market value to be $8.75/AUM; updated surveys will be done as needed. The 1985 grazing rate was increased to $5.81/AUM.

Much of the information you request is beyond the scope of this document, with some of it not available.



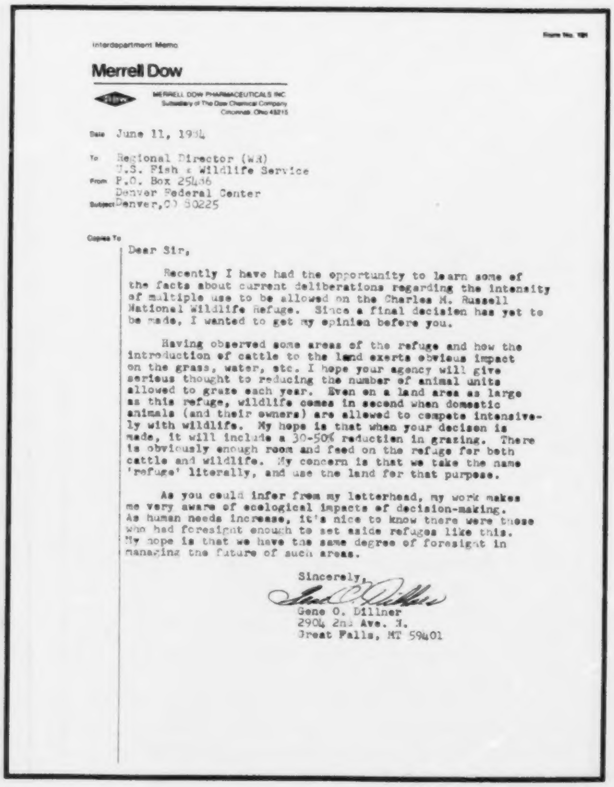
GEORGE A. DICKMAN
1711 RIVER ROAD
MISSOULA, MONTANA 59801

8/1/84

Dear Sir

I am writing about the 33% live-stock reduction on the C.M. Russell Wildlife Refuge. I would like to see a 100% reduction. I always thought a wild life refuge was just that, & not a pasture for domestic live stock. Please do all you can to see this is taken care of. If this becomes a reality, other species can be introduced, & we'll have a refuge as it should be. No more development should be permitted and all species should be protected. Thank you.

Sincerely,
George A. Dickman



Interdepartment Memo

Form No. 191

Merrell Dow

MERRELL DOW PHARMACEUTICALS INC.
Subsidiary of The Dow Chemical Company
Cincinnati, Ohio 45215

Date June 11, 1984

To Regional Director (WR)
U.S. Fish & Wildlife Service
From P.O. Box 25486
Denver Federal Center
Subject Denver, CO 80225

Copies To

Dear Sir,

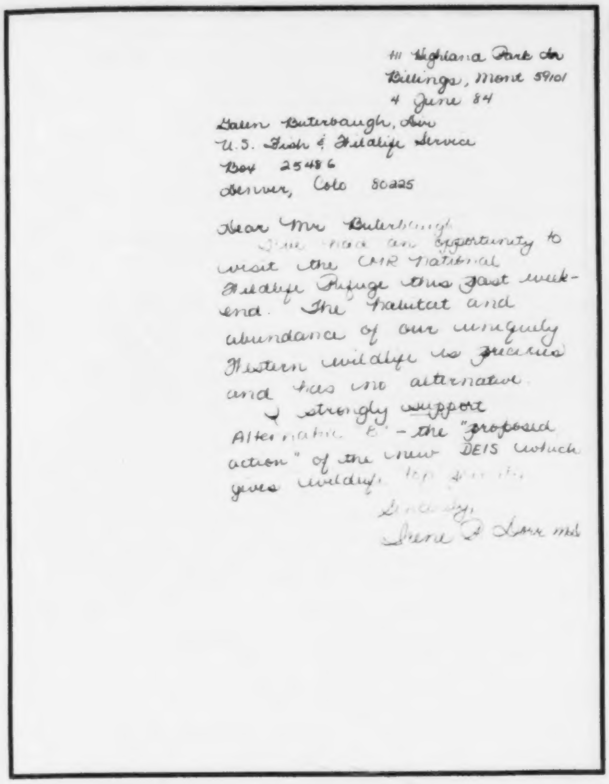
Recently I have had the opportunity to learn some of the facts about current deliberations regarding the intensity of multiple use to be allowed on the Charles M. Russell National Wildlife Refuge. Since a final decision has yet to be made, I wanted to get my opinion before you.

Having observed some areas of the refuge and how the introduction of cattle to the land exerts obvious impact on the grass, water, etc. I hope your agency will give serious thought to reducing the number of animal units allowed to graze each year. Even on a land area as large as this refuge, wildlife comes in second when domestic animals (and their owners) are allowed to compete intensively with wildlife. My hope is that when your decisen is made, it will include a 30-50% reduction in grazing. There is obviously enough room and feed on the refuge for both cattle and wildlife. My concern is that we take the name 'refuge' literally, and use the land for that purpose.

As you could infer from my letterhead, my work makes me very aware of ecological impacts of decision-making. As human needs increase, it's nice to know there were those who had foresight enough to set aside refuges like this. My hope is that we have the same degree of foresight in managing the future of such areas.

Sincerely,
Gene O. Dillner

Gene O. Dillner
2904 2nd Ave. N.
Great Falls, MT 59401

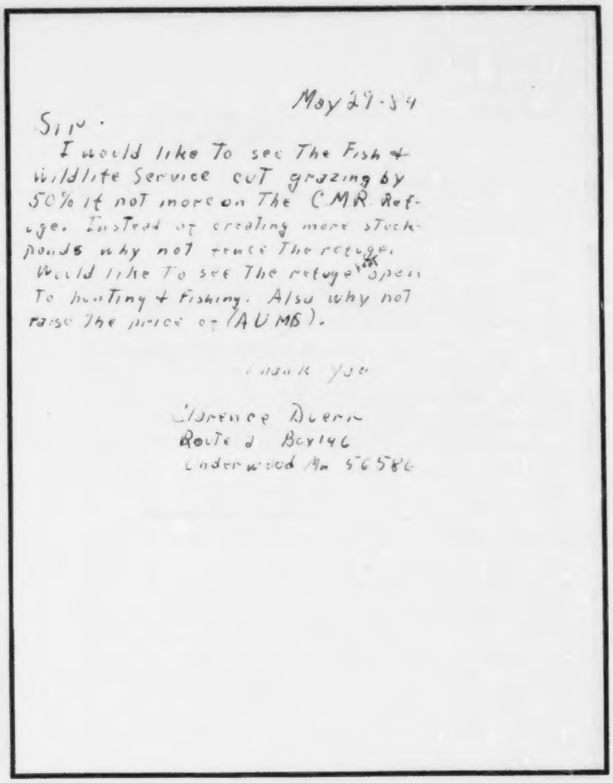


111 Highland Park Dr
Billings, Mont 59101
4 June 84

Galen Buterbaugh, Dir
U.S. Fish & Wildlife Service
Box 25486
Denver, Colo 80225

Dear Mr Buterbaugh
I've had an opportunity to visit the CMR National Wildlife Refuge this past week-end. The habitat and abundance of our uniquely Western wildlife is precious and has no alternative.
I strongly support Alternative "B" - the "proposed action" of the new DEIS which gives wildlife top priority.

Sincerely,
Irene D. Lowe md

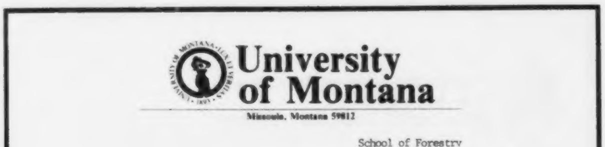


May 29-84

Sir:
I would like To see The Fish + Wildlife Service cuT grazing by 50% if noT more on The C.M.R. Refuge. InsTead of creating more stock-ponds why noT fence The refuge. Would like To see The refuge kept open To hunTing + Fishing. Also why noT raise The price of (AUMS).

Thank you

Clarence Duern
Route 2 Box146
Underwood Mn 56586



University of Montana
Missoula, Montana 59812

School of Forestry
(406)243-2773

June 4, 1984

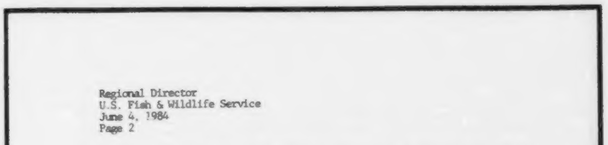
Regional Director
U.S. Fish & Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, CO 80225

Dear Sir:

I have just reviewed the revised DEIS released by the Charles M. Russell National Wildlife Refuge and wish to make the following comments. I support the alternative proposed by the Fish and Wildlife Service, which would reduce the total number of livestock AUM's from 60,108 to 40,482. I concur with the San Francisco Appellate Court decision that wildlife should have priority access to forage and other range resources. The Audubon magazine article of last year, about the refuge system, which stated that Ralph Fries operates the largest cattle ranch in the country was a sad but very accurate portrayal of the CMR situation. I feel the Refuge staff has given a great deal of consideration to the local livestock interest in their proposed plan. I personally would call for a greater reduction in livestock AUM's or at the least, charge market price for the forage, which would probably significantly reduce the demand. The Refuge should have a complete boundary fence to control grazing. In short, the Refuge should be managed for wildlife not livestock.

In addition to a minimum reduction of 32% in livestock AUM's I wish to offer some additional comments which stem from my review of the DEIS, from personal familiarity with the CMR as a hunter and Wildlife Research Biologist, and through extensive review of studies conducted on the CMR and similar habitat. The Missouri River Breaks offer a unique habitat that should be managed so as to maintain ecological stability as well as the natural beauty of the area. Management should favor all wildlife indigenous to the Refuge, not just game species. However, I am in favor of continuing to allow hunting and fishing on the Refuge. Prairie dogs should not be controlled on the Refuge; enough of this occurs on adjacent properties. Prairie dog towns only account for about 0.6% of the Refuge land area, and a recent Ph.D. thesis by a colleague presented good evidence that this land area represents almost the maximum amount of occupiable habitat for prairie dog towns. Prairie dog towns offer a distinct habitat

Equal Opportunity in Education and Employment



Regional Director
U.S. Fish & Wildlife Service
June 4, 1984
Page 2

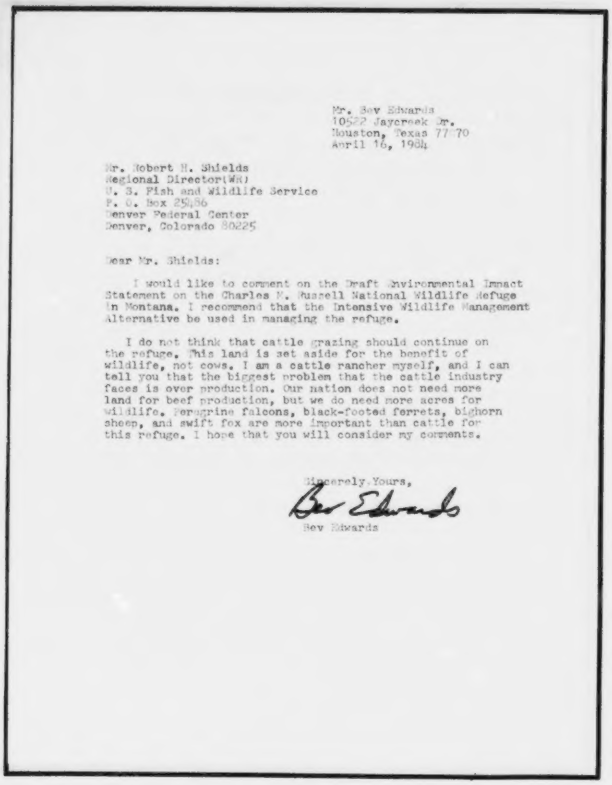
which appear to be required by many wildlife species including black footed ferrets, mountain plovers, horned larks, and burrowing owls.

I appreciate the opportunity to comment on the DEIS.

Sincerely,

W. Daniel Edge

W. Daniel Edge
Wildlife Research Specialist



Mr. Bev Edwards
10522 Jaycreek Dr.
Houston, Texas 77070
April 16, 1984

Mr. Robert H. Shields
Regional Director(WR)
U. S. Fish and Wildlife Service
P. O. Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Mr. Shields:

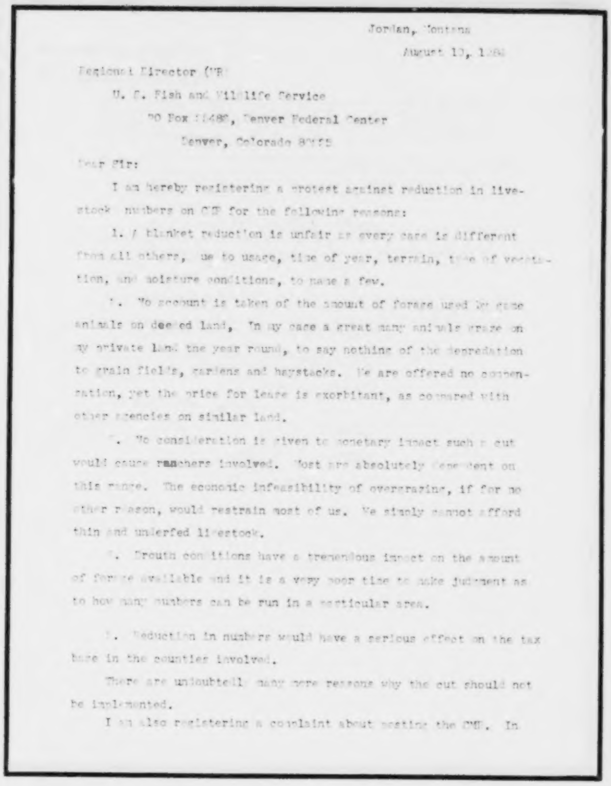
I would like to comment on the Draft Environmental Impact Statement on the Charles M. Russell National Wildlife Refuge in Montana. I recommend that the Intensive Wildlife Management Alternative be used in managing the refuge.

I do not think that cattle grazing should continue on the refuge. This land is set aside for the benefit of wildlife, not cows. I am a cattle rancher myself, and I can tell you that the biggest problem that the cattle industry faces is over production. Our nation does not need more land for beef production, but we do need more acres for wildlife. Peregrine falcons, black-footed ferrets, bighorn sheep, and swift fox are more important than cattle for this refuge. I hope that you will consider my comments.

Sincerely Yours,

Bev Edwards

Bev Edwards



Jordan, Montana
August 10, 1984

Regional Director (WR)
U. S. Fish and Wildlife Service
PO Box 25486, Denver Federal Center
Denver, Colorado 80225

Dear Sir:

I am hereby registering a protest against reduction in livestock numbers on CMR for the following reasons:

1. A blanket reduction is unfair as every case is different from all others, due to usage, time of year, terrain, type of vegetation, and moisture conditions, to name a few.

2. No account is taken of the amount of forage used by game animals on deeded land. In my case a great many animals graze on my private land the year round, to say nothing of the depredation to grain fields, gardens and haystacks. We are offered no compensation, yet the price for lease is exorbitant, as compared with other agencies on similar land.

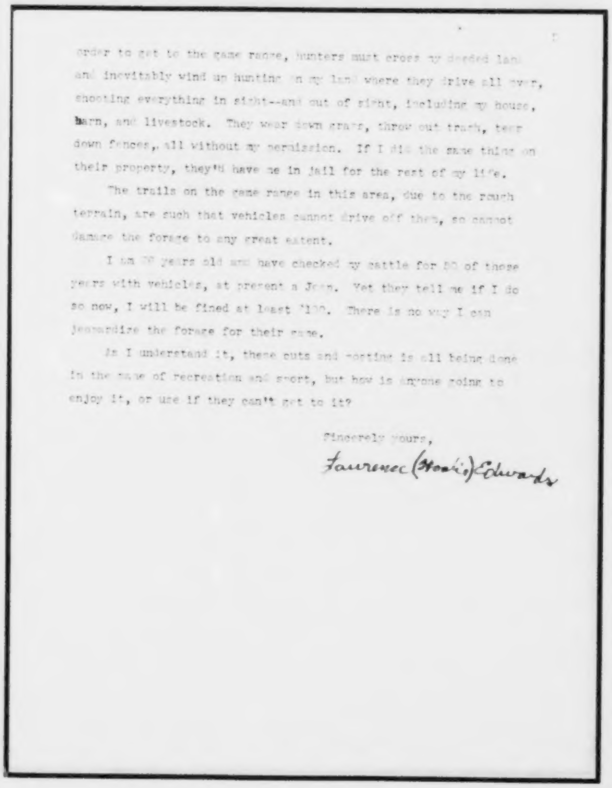
3. No consideration is given to monetary impact such a cut would cause ranchers involved. Most are absolutely dependent on this range. The economic infeasibility of overgrazing, if for no other reason, would restrain most of us. We simply cannot afford thin and underfed livestock.

4. Drouth conditions have a tremendous impact on the amount of forage available and it is a very poor time to make judgment as to how many numbers can be run in a particular area.

5. Reduction in numbers would have a serious effect on the tax base in the counties involved.

There are undoubtedly many more reasons why the cut should not be implemented.

I am also registering a complaint about posting the CMR. In



order to get to the game range, hunters must cross my deeded land and inevitably wind up hunting on my land where they drive all over, shooting everything in sight--and out of sight, including my house, barn, and livestock. They wear down grass, throw out trash, tear down fences, all without my permission. If I did the same thing on their property, they'd have me in jail for the rest of my life.

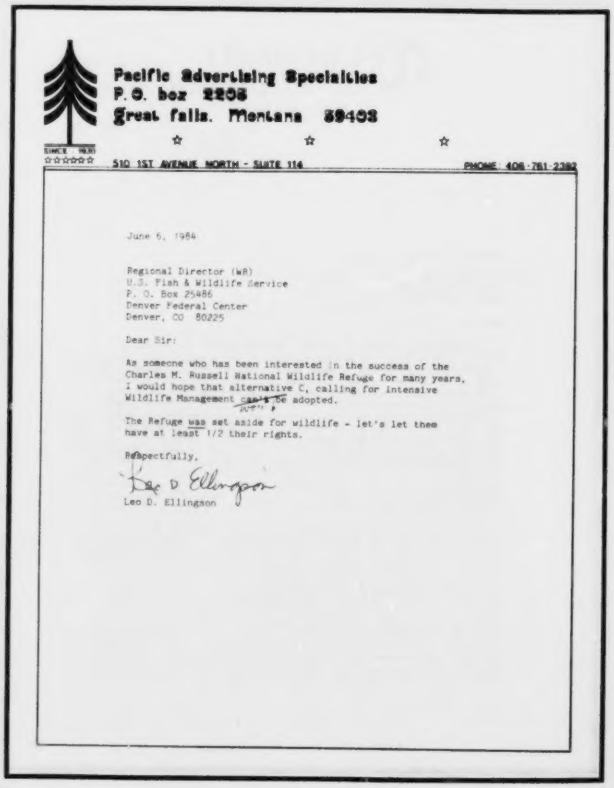
The trails on the game range in this area, due to the rough terrain, are such that vehicles cannot drive off them, so cannot damage the forage to any great extent.

I am [illegible] years old and have checked my cattle for 50 of those years with vehicles, at present a Jeep. Yet they tell me if I do so now, I will be fined at least $100. There is no way I can jeopardize the forage for their game.

As I understand it, these cuts and posting is all being done in the name of recreation and sport, but how is anyone going to enjoy it, or use if they can't get to it?

Sincerely yours,

Laurence ([illegible]) Edwards



Pacific Advertising Specialties
P.O. box 2205
Great falls. Montana 59403
☆ ☆ ☆
SINCE [illegible]
510 1ST AVENUE NORTH - SUITE 114 PHONE: 406-761-2392

June 6, 1984

Regional Director (WR)
U.S. Fish & Wildlife Service
P. O. Box 25486
Denver Federal Center
Denver, CO 80225

Dear Sir:

As someone who has been interested in the success of the Charles M. Russell National Wildlife Refuge for many years, I would hope that alternative C, calling for intensive Wildlife Management ~~can't~~ will be adopted.

The Refuge was set aside for wildlife - let's let them have at least 1/2 their rights.

Respectfully,

Leo D Ellingson

Leo D. Ellingson

1833 S. 14th W.
Missoula, MT 59801
8-14-84

Galen Buterbaugh, Regional Director
U.S. Fish and Wildlife Service
Box 25468
Denver, CO 80225

Dear Sir;

I was able to give brief oral testimony at the public hearing held in Missoula and would like the following writen statement included also as part of my testimony, for the record:

In listening to the testimony presented by others at the public hearing in Missoula it struck me that there is a good deal of ignorance or misunderstanding regarding what the CMR National Wildlife Refuge is. I heard it many times referred to as a "game range", or "game refuge", seldom was it referred to as the National Wildlife Refuge that it is. National Wildlife Refuge is a designation and a name that was given to the CMR by Congress. Clarification of what a NWR is, I believe is important if not fundamental to setting the management direction for the CMR. I would like to analyze the name National Wildlife Refuge and perhaps shed some light in the process.

First of all we have National, meaning

2

belonging to the public, all the public, all over this nation, not just those fortunate enough to live next door. Also meaning of more than local or even regional importance to wildlife, in short nationally important, the CMR is the largest prairie refuge in the nation. Futhermore prairies and plains have probably been more appropriated for man's use than any other major ecosystem.

Next we have *Wildlife*; not cattle, not just game, but all manner of animals, game as well as non-game, as well as predator have their place at CMR. Those they may have existed but are now absent should be reintroduced as possible. It seems absurd to have to say this but, Wildlife should have priority over domestic stock for any and all resources for which they compete.

This brings use to Refuge. All ready by far the majority of former prairie wildlife habitat is devoted primarily to raising livestock or growing crops, the CMR is truely needed as a refuge if only it will be managed as such.

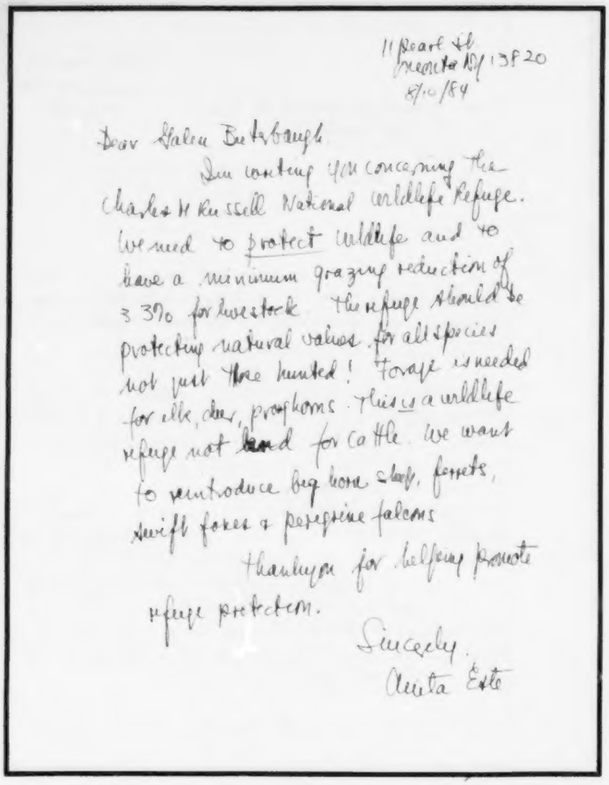
It is high time we move CMR from what is has become predominantly a local livestock range, back to what its name implies it should be - primarily a National Wildlife Refuge. I support and applaud the FWS in its proposed management plan for the CMR, a 33% reduction in grazing is a much needed and long overdue first step in putting

3

meaning back into the title NWR for the CMR.

For the record I would also like to point out that grazing on public land is a privelege not a right, furthermore it is a privilege that is publicly subsidized by low grazing fees. I don't see that the grazing permitees have any grounds to bitch, they should feel lucky to have gotten away with using public resources for so little for so long and just be happy they live where they do.

Sincerely yours,
Don A. Essig
Don A. Essig



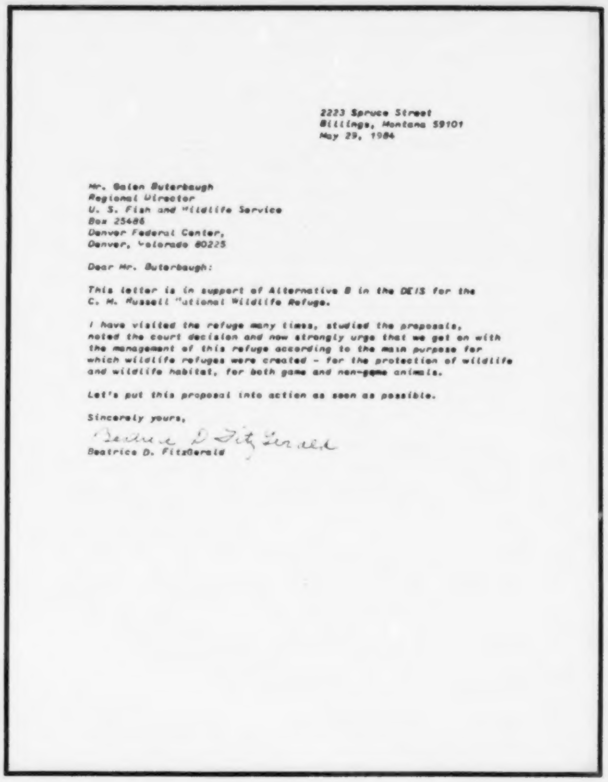
11 Pearl St
Oneonta NY 13820
8/10/84

Dear Galen Butzbaugh

I'm writing you concerning the Charles M Russell National Wildlife Refuge. We need to protect wildlife and to have a minimum grazing reduction of 33% for livestock. The refuge should be protecting natural values for all species not just those hunted! Forage is needed for elk, deer, pronghorns. This is a wildlife refuge not land for cattle. We want to reintroduce big horn sheep, ferrets, swift foxes & peregrine falcons

Thank you for helping promote refuge protection.

Sincerely,
Anita Este



2223 Spruce Street
Billings, Montana 59101
May 29, 1984

Mr. Galen Buterbaugh
Regional Director
U. S. Fish and Wildlife Service
Box 25486
Denver Federal Center,
Denver, Colorado 80225

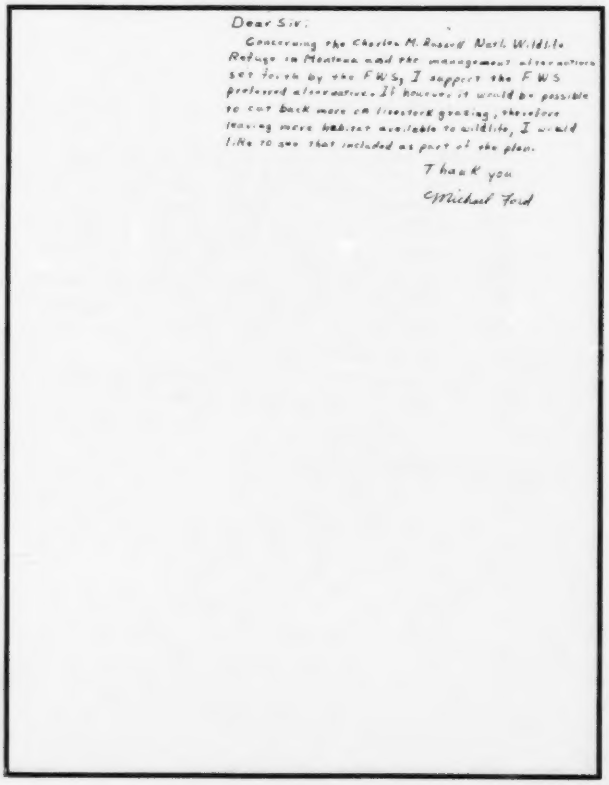
Dear Mr. Buterbaugh:

This letter is in support of Alternative B in the DEIS for the C. M. Russell National Wildlife Refuge.

I have visited the refuge many times, studied the proposals, noted the court decision and now strongly urge that we get on with the management of this refuge according to the main purpose for which wildlife refuges were created - for the protection of wildlife and wildlife habitat, for both game and non-game animals.

Let's put this proposal into action as soon as possible.

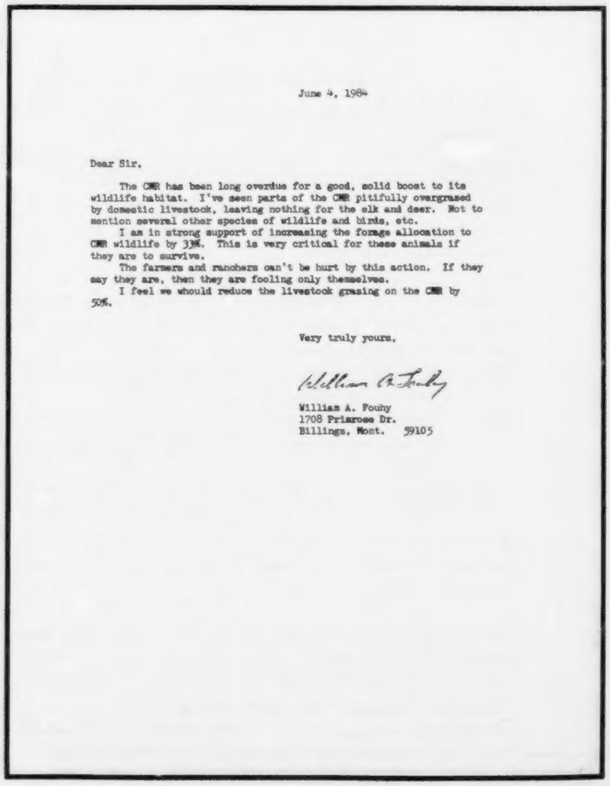
Sincerely yours,
Beatrice D FitzGerald
Beatrice D. FitzGerald



Dear Sir:

Concerning the Charles M. Russell Natl. Wildlife Refuge in Montana and the management alternatives set forth by the FWS, I support the FWS preferred alternative. If however it would be possible to cut back more on livestock grazing, therefore leaving more habitat available to wildlife, I would like to see that included as part of the plan.

Thank you
Michael Ford



June 4, 1984

Dear Sir,

The CMR has been long overdue for a good, solid boost to its wildlife habitat. I've seen parts of the CMR pitifully overgrazed by domestic livestock, leaving nothing for the elk and deer. Not to mention several other species of wildlife and birds, etc.

I am in strong support of increasing the forage allocation to CMR wildlife by 33%. This is very critical for these animals if they are to survive.

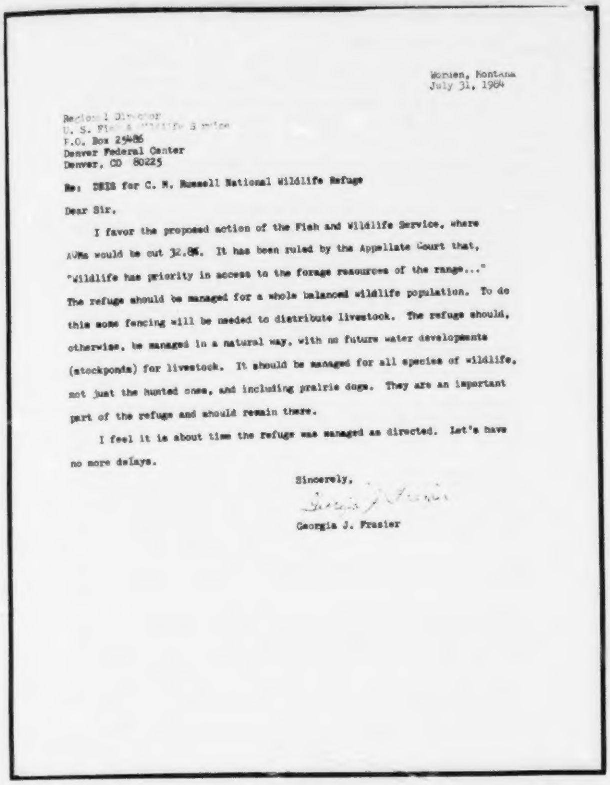
The farmers and ranchers can't be hurt by this action. If they say they are, then they are fooling only themselves.

I feel we whould reduce the livestock grasing on the CMR by 50%.

Very truly yours,

William A. Fouhy

William A. Fouhy
1708 Primrose Dr.
Billings, Mont. 59105



Worden, Montana
July 31, 1984

Regional Director
U. S. Fish & Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, CO 80225

Re: DEIS for C. M. Russell National Wildlife Refuge

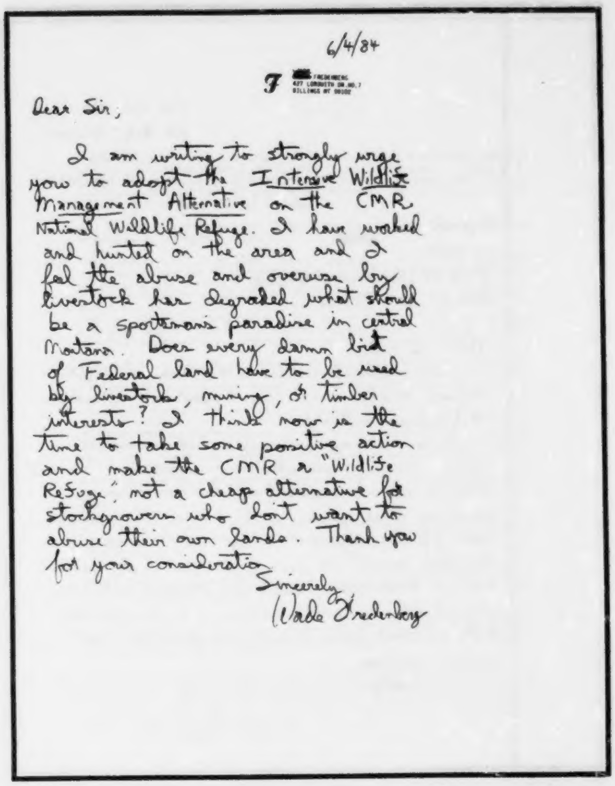
Dear Sir,

I favor the proposed action of the Fish and Wildlife Service, where AUMs would be cut 32.8%. It has been ruled by the Appellate Court that, "Wildlife has priority in access to the forage resources of the range..." The refuge should be managed for a whole balanced wildlife population. To do this some fencing will be needed to distribute livestock. The refuge should, otherwise, be managed in a natural way, with no future water developments (stockponds) for livestock. It should be managed for all species of wildlife, not just the hunted ones, and including prairie dogs. They are an important part of the refuge and should remain there.

I feel it is about time the refuge was managed as directed. Let's have no more delays.

Sincerely,

Georgia J. Frasier



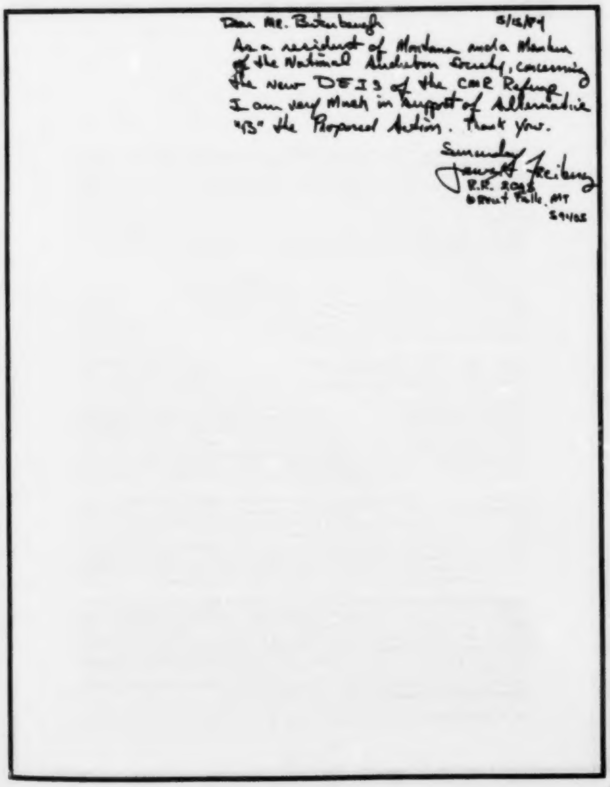
6/4/84

F [redacted] FREDENBERG
427 [illegible] DR. NO. 7
BILLINGS MT 59102

Dear Sir;

I am writing to strongly urge you to adopt the Intensive Wildlife Management Alternative on the CMR National Wildlife Refuge. I have worked and hunted on the area and I feel the abuse and overuse by livestock has degraded what should be a sportsman's paradise in central Montana. Does every damn bit of Federal land have to be used by livestock, mining, or timber interests? I think now is the time to take some positive action and make the CMR a "Wildlife Refuge" not a cheap alternative for stockgrowers who don't want to abuse their own lands. Thank you for your consideration

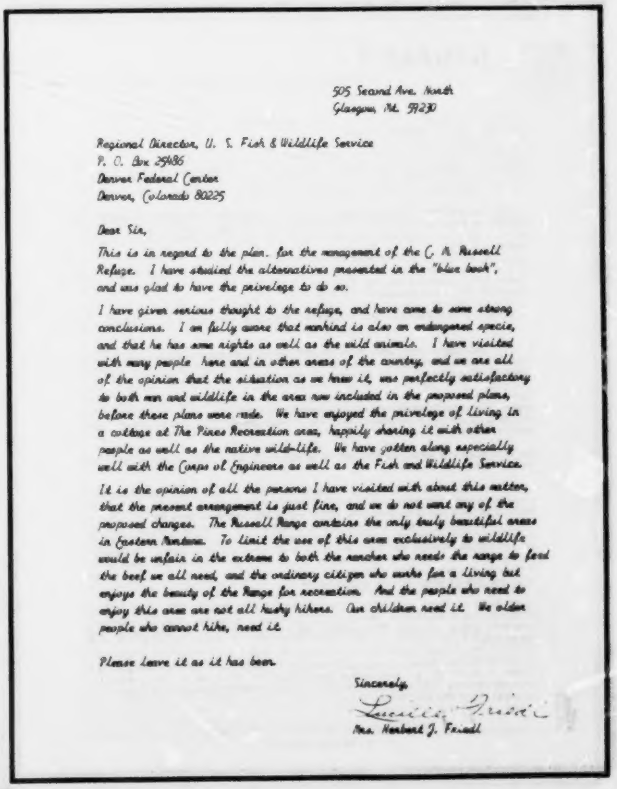
Sincerely
Wade Fredenberg



Dear Mr. Bitterbaugh 5/15/84

As a resident of Montana and a Member of the National Audubon Society, concerning the new DEIS of the CMR Refuge I am very Much in support of Alternative "B" the Proposed Action. Thank you.

Sincerely
Freiberg
R.R. 2028
Great Falls, MT
59405



505 Second Ave. North
Glasgow, Mt. 59230

Regional Director, U. S. Fish & Wildlife Service
P. O. Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Sir,

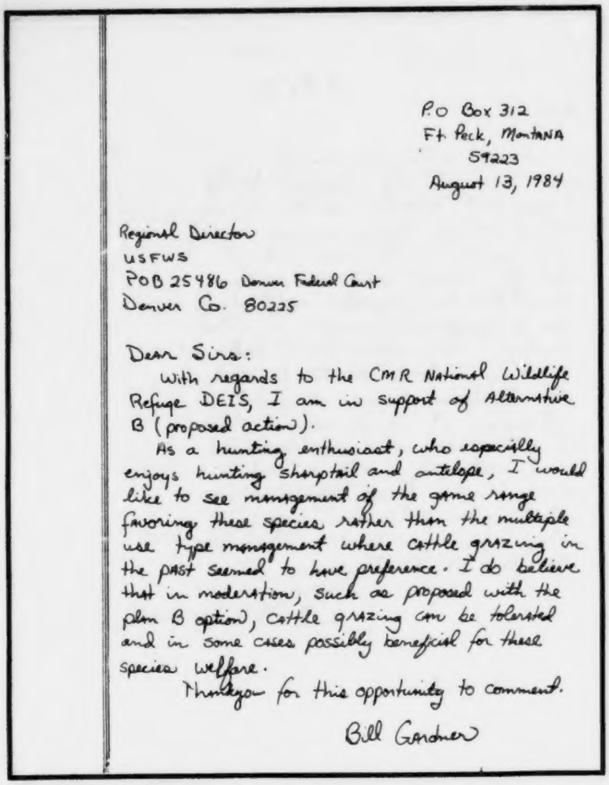
This is in regard to the plan. for the management of the C. M. Russell Refuge. I have studied the alternatives presented in the "blue book", and was glad to have the privelege to do so.

I have given serious thought to the refuge, and have come to some strong conclusions. I am fully aware that mankind is also an endangered specie, and that he has some rights as well as the wild animals. I have visited with many people here and in other areas of the country, and we are all of the opinion that the situation as we knew it, was perfectly satisfactory to both man and wildlife in the area now included in the proposed plans, before these plans were made. We have enjoyed the privelege of living in a cottage at The Pines Recreation area, happily sharing it with other people as well as the native wild-life. We have gotten along especially well with the Corps ol Engineers as well as the Fish and Wildlife Service.

It is the opinion of all the persons I have visited with about this matter, that the present arrangement is just fine, and we do not want any of the proposed changes. The Russell Range contains the only truly beautiful areas in Eastern Montana. To limit the use of this area exclusively to wildlife would be unfair in the extreme to both the rancher who needs the range to feed the beef we all need, and the ordinary citizen who works for a living but enjoys the beauty of the Range for recreation. And the people who need to enjoy this area are not all husky hikers. Our children need it. We older people who cannot hike, need it.

Please Leave it as it has been.

Sincerely,
Lucille Friedl
Mrs. Herbert J. Friedl



P.O Box 312
Ft Peck, Montana
59223
August 13, 1984

Regional Director
USFWS
POB 25486 Denver Federal Court
Denver Co. 80225

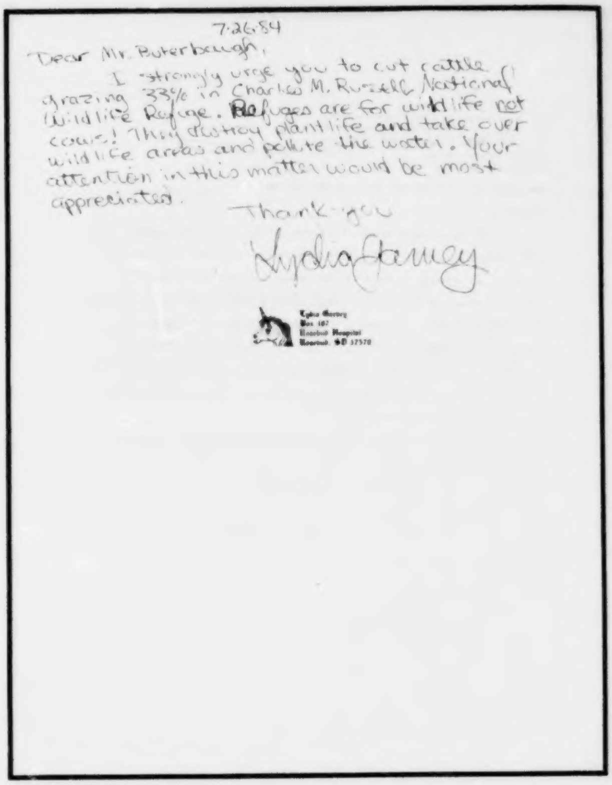
Dear Sirs:

With regards to the CMR National Wildlife Refuge DEIS, I am in support of Alternative B (proposed action).

As a hunting enthusiast, who especilly enjoys hunting sharptail and antelope, I would like to see management of the game range favoring these species rather than the multiple use type management where cattle grazing in the past seemed to have preference. I do believe that in moderation, such as proposed with the plan B option, cattle grazing can be tolerated and in some cases possibly beneficial for these species welfare.

Thankyou for this opportunity to comment.

Bill Gardner



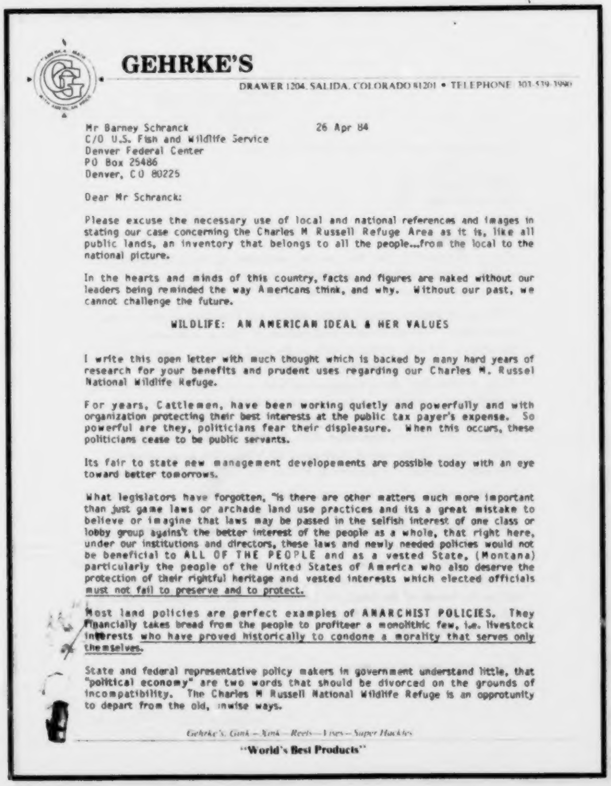
7·26·84

Dear Mr. Buterbaugh,

I strongly urge you to cut cattle grazing 33% in Charles M. Russell National Wildlife Refuge. Refuges are for wildlife not cows! They destroy plantlife and take over wildlife areas and pollute the water. Your attention in this matter would be most appreciated.

Thank-you

Lydia Garvey



GEHRKE'S

DRAWER 1204, SALIDA, COLORADO 81201 • TELEPHONE 303-539-3990

Mr Barney Schranck
C/O U.S. Fish and Wildlife Service
Denver Federal Center
PO Box 25486
Denver, CO 80225

26 Apr 84

Dear Mr Schranck:

Please excuse the necessary use of local and national references and images in stating our case concerning the Charles M Russell Refuge Area as it is, like all public lands, an inventory that belongs to all the people...from the local to the national picture.

In the hearts and minds of this country, facts and figures are naked without our leaders being reminded the way Americans think, and why. Without our past, we cannot challenge the future.

WILDLIFE: AN AMERICAN IDEAL & HER VALUES

I write this open letter with much thought which is backed by many hard years of research for your benefits and prudent uses regarding our Charles M. Russel National Wildlife Refuge.

For years, Cattlemen, have been working quietly and powerfully and with organization protecting their best interests at the public tax payer's expense. So powerful are they, politicians fear their displeasure. When this occurs, these politicians cease to be public servants.

Its fair to state new management developements are possible today with an eye toward better tomorrows.

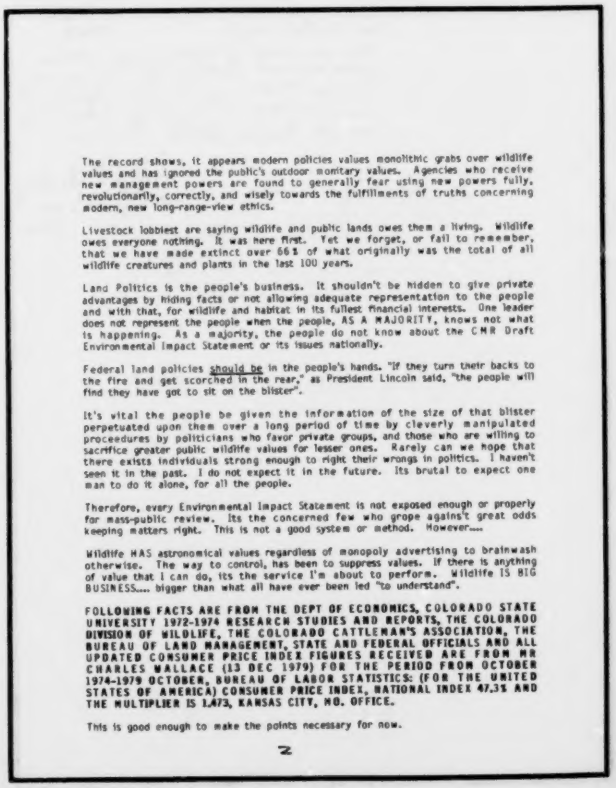
What legislators have forgotten, "is there are other matters much more important than just game laws or archade land use practices and its a great mistake to believe or imagine that laws may be passed in the selfish interest of one class or lobby group against the better interest of the people as a whole, that right here, under our institutions and directors, these laws and newly needed policies would not be beneficial to ALL OF THE PEOPLE and as a vested State, (Montana) particularly the people of the United States of America who also deserve the protection of their rightful heritage and vested interests which elected officials must not fail to preserve and to protect.

Most land policies are perfect examples of ANARCHIST POLICIES. They financially takes bread from the people to profiteer a monolithic few, i.e. livestock interests who have proved historically to condone a morality that serves only themselves.

State and federal representative policy makers in government understand little, that "political economy" are two words that should be divorced on the grounds of incompatibility. The Charles M Russell National Wildlife Refuge is an opprotunity to depart from the old, unwise ways.

Gehrke's, Gink — Xink — Reels — Lines — Super Hackles

"World's Best Products"



The record shows, it appears modern policies values monolithic grabs over wildlife values and has ignored the public's outdoor monitary values. Agencies who receive new management powers are found to generally fear using new powers fully, revolutionarily, correctly, and wisely towards the fulfillments of truths concerning modern, new long-range-view ethics.

Livestock lobbiest are saying wildlife and public lands owes them a living. Wildlife owes everyone nothing. It was here first. Yet we forget, or fail to remember, that we have made extinct over 66% of what originally was the total of all wildlife creatures and plants in the last 100 years.

Land Politics is the people's business. It shouldn't be hidden to give private advantages by hiding facts or not allowing adequate representation to the people and with that, for wildlife and habitat in its fullest financial interests. One leader does not represent the people when the people, AS A MAJORITY, knows not what is happening. As a majority, the people do not know about the CMR Draft Environmental Impact Statement or its issues nationally.

Federal land policies should be in the people's hands. "If they turn their backs to the fire and get scorched in the rear," as President Lincoln said, "the people will find they have got to sit on the blister".

It's vital the people be given the information of the size of that blister perpetuated upon them over a long period of time by cleverly manipulated proceedures by politicians who favor private groups, and those who are willing to sacrifice greater public wildlife values for lesser ones. Rarely can we hope that there exists individuals strong enough to right their wrongs in politics. I haven't seen it in the past. I do not expect it in the future. Its brutal to expect one man to do it alone, for all the people.

Therefore, every Environmental Impact Statement is not exposed enough or properly for mass-public review. Its the concerned few who grope against great odds keeping matters right. This is not a good system or method. However....

Wildlife HAS astronomical values regardless of monopoly advertising to brainwash otherwise. The way to control, has been to suppress values. If there is anything of value that I can do, its the service I'm about to perform. Wildlife IS BIG BUSINESS.... bigger than what all have ever been led "to understand".

FOLLOWING FACTS ARE FROM THE DEPT OF ECONOMICS, COLORADO STATE UNIVERSITY 1972-1974 RESEARCH STUDIES AND REPORTS, THE COLORADO DIVISION OF WILDLIFE, THE COLORADO CATTLEMAN'S ASSOCIATION, THE BUREAU OF LAND MANAGEMENT, STATE AND FEDERAL OFFICIALS AND ALL UPDATED CONSUMER PRICE INDEX FIGURES RECEIVED ARE FROM MR CHARLES WALLACE (13 DEC 1979) FOR THE PERIOD FROM OCTOBER 1974-1979 OCTOBER, BUREAU OF LABOR STATISTICS: (FOR THE UNITED STATES OF AMERICA) CONSUMER PRICE INDEX, NATIONAL INDEX 47.3% AND THE MULTIPLIER IS 1.473, KANSAS CITY, MO. OFFICE.

This is good enough to make the points necessary for now.

2

A Mule Deer is worth $1,044.36 harvested to the State of Colorado and nearly the same for most other states. The Whitetail deer have greater value in heavily hunted eastern states.

Out of this figure, our federal union of states receive the license fees and taxes gentlemen. The remainder goes to dealers in equipment, motels, vehicle and truck sales, coffee shops, to outfitters, restaurants, guides, gasoline and services in stations, petroleum industries, newspapers, magazines, advertising, doctors, tireshops, mechanical shops, grocery stores, discount stores, department stores, clothing, finance companies, BANKS for loans, hotels, traffic tickets, sight seeing attractions, and tens of thousands of other businesses directly and indirectly. These are voters which have bills to pay, families to support, which are vital to social business intercourses that affects EVERY citizen in all walks of life. Its impossible not to name someone who isn't affected by the values of wildlife and who doesn't receive money because of its existance.

Agriculture, timbering or mining, individually, DON'T produce the financial benefits to the American public that they obtain directly from outdoor recreation alone. OUTDOOR RECREATION causes more social interplay and money exchanges than any other single industry in this nation.

For example, I point out the first of many financial errors in the CMR EIS that is on page 56, which states "Farming is the largest single income producing sector of the six county regional economy (Appendix 11) Gross income from this sector in 1975 amounted to $70.9 million and represented about 42 percent of the total income".

The truth of the matter is, OUTDOOR RECREATION is the number #1 single income producting industry and inventory for the state of Montana, nearing approximately $3 Billion dollars a year. This is immediately ratioed for review, in the light that on the same page, (bottom) only 357,000 visitors who came to CMR only, injected $11.4 million into the economy. To state farming is the number one industry is and has been a falacy for years. Because no-one has challenged it with facts, which are to compound here.

For one Mule Deer to be worth $1044.36 to any economy represents a lot of money and the individuals required to pursue and capture one animal requires a substancial, group investment.

As reported 26 April 84 to this researcher by Mr Joe Egan, Montana Dept. of Fish, Wildlife and Parks: In 1982 alone, 140,222 individuals hunted deer and harvested 100,340 animals. This activity alone, produced for the state of Montana, $104,791,082.00 of revenue. Remember all those services who receive these monies mentioned earlier? We have already exceeded the farm economy figures previously pointed out in the EIS.

Of this figure, for 1983, the Charles M Russell area provided 2100 total deer harvested for a Montana financial injection value of $2,193,156.00 dollars.

The question isn't integrity of facts presented here, but rather the reviewer should question their own choice of ignorence as opposed to what is available here for thought. One cannot make a choice, unless they have two things to choose from. "Concern" is established by the reviewer's enthusiasum to research rather than a writer providing all the work and truths. However, this figures are drastically different from previous knowledge available.

Who is using any of these facts in issues for Montana's best interest? Not one professional in all responses to the EIS!

The destruction reeked on public lands by lost habitat exceeds all social benefits stockmen are capable of returning to society when used here. We are permitting the starvation and DECREASES of more practical WILDLIFE SPECIES that are vital to this nation's economy. This political malfeasance is encouraged through ingnorence through Cattleman's Assocations, and by local, state, and Federal vote seekers. The fact of the matter is, the 'general type of official' hasn't had this information before. The sooner we communicates and use this knowledge, the less chance of serious errors of priorities concerning the public's Russell Refuge.

Whenever there is opportunity to increase land values for public profits, new application policies should be used studied that differ from old wasteful ones.
All economic features of the present C.M.R E.I.S. is completely false, unrelating to actual facts and conditions as a national inventory treasure. Factors concerning Changes in Sales are nothing more than guesses not based on facts. The same holds true concerning employment trends and issues and the graphs serve only to fill pages without historical proofs. All figures and linear programming analysis is not explained and have no meaning or grounds for challenge and certainly should not be used to make any judgements concerning which management choice is best. Plus and minus signs serve no economic value for judgement evaluation and are worthless in a vital decision making process. They are vague, dangerous, unprofessional and leaves the public to only wonder about "responsible policy makers".

A bolder, more honest, direct policy directive is needed and probably a whole, newer choice available from all previous ones issued by this government agency in the past.

For instance: What ONE COW CONSUMES starves out three Wapiti worth $24,918.75 to the States that have them. (Like Wyoming, Montana, Idaho, Oregon, Colorado) each month it grazes.

Its evident its NOT in the best interests of the Cattleman's Associations to admit to the American people that Wildlife, its habitat, big game, fishing, and outdoor recreation which only natural habitat can provide exceeds them both in financial and more intelligent public land use.

(VALUE OF A WAPITI IS $8,306.25) From "Benefit/Cost Analysis and Mitigation of Wildlife Losses" Colorado Division of Wildlife-Wildlife Values Task Force. Nationa' Price Index Corrections are to October 1979 and also backed by personal questionaires and research economics, interviewing hundreds of hunters over a period of three years, (1979, 1980, 1981).

Special interests, cannot afford to let the public know the coyote is worth more to a local outdoor economy than his calf.

Each coyote is worth $46.10 to any state. Fur market in 1979 via Jonas Brothers and Lloyd Furs: $85 - $200 dollars, equals from $131.10 - $246.10 value for each coyote. The pelt values (tanned and untanned) were obtained from fur buyers other besides those just presented. How long they will maintain any monitary level is determined by supply & demand. A coyote coat, after cutting and manufacture for the fur houses and following their patterns and instructions in New York, is returned to Denver or Seattle and sell from $4000.00 to $8,000.00 Dollars EACH.

A Mountain Goat is worth.....$2,180.04
A Cougar......................$2,356.80
A Wapiti......................$8,306.25
A Black Bear..................$9,427.20
A Turkey......................$503.01
A Goose.......................$248.52
A Cotton Tail Rabbit..........$31.03
A Bighorn Sheep...............$16,497.60

Fur trapping, helps many highschoolers, young adults, and untold thousands of other citizens to make money or save for their college years. Coyotes and all fur bearing animals have tremendous financial worth. They should not be destroyed to pacify the selfish few. Its now time to question that which is true and false through serious research.

Sheepmen make financial windfalls on apathy. How any stockperson can buy ONE sheep, put it on almost free public graze, get it fat and growing, sell it and say he can't do it at a good profit is not being honest about the facts.

A fact concerning Bighorn sheep, is domestic sheep kill bighorns through the deseases they inflict. ONE domestic sheep can wipe out a whole area of Bighorns, each of which is worth $16,497.60 each to the state of Montana. Page 45 shows a herd of 54 Bighorns were exposed to sheep and perished. The primary cause is always exposure to sheep as my studies in Alaska testify. This was a loss of $890,870.40 to the people of the State of Montana and exceeds $1,000,000.00 million dollars in state and federal invested efforts building the herd to this number. A loss that is due to allowing commercial sheep grazing practices.

To think we must accomodate stockmen's monoplies to be employed at public expense, is gross stupidity and totally irresponsible.

The primary question to ask TODAY in face of the facts is: "WHO said" we MUST sacrifice animals such as Coyotes and Bighorns to accommodate habitat destructive livestock and grazing practices in the first place?

Stockmen have perpetuated these falacies. NONE of which ever should represent the will or desires of the public but only the forceful and organized "managed will" of these few who USE politicians who DON'T UNDERSTAND THE TRUE WILDLIFE AND OUTDOOR RECREATION VALUES FOR THE PEOPLE, to the LOCAL, or to the NATIONAL ECONOMIC STRUCTURE.

On only ONE county level, (as an example) there are 125 ranchers DICTATING economic policies for over 8,000 citizens and over 300 Million Americans, in Gunnison County, State of Colorado alone, concerning PUBLIC lands there.

Now, in the CMR area, 87 ranchers wish to continue to dictate habitat policies that affect the welfare of all citizens of the United States concerning our CMR Refuge. This is not democracy.

Who are sportsmen? Its not who most believe because 'sportsmen' are the majority of the average population.

Overall, two thirds of the Amercian People who use the outdoors.....FISH. This is a huge, untapped voting and power block. A much larger segment are sportspersons who just walk, go out, picnic, visit, travel, look, because of the lure of animals and wilderness, and the pressures are increasing each year.

Sportsmen (but better understood as "people who step into the outdoors") keep active Hundreds of Thousands of Businesses that must meet bank notes. Their activities maintain industries who pay large expenses to operate and benefit directly from his pursuit of big game in ever decreasing herds and fishes in ever poorer waters. Decreased daily because of lax senses of values over cattle, mining, timber practices, and laws and who operate daily under criminal land-use methods and unqualified or weak state and federal supervision. In this lays vast amounts of public wastes. The greatest damages are done by livestock and unauthorized roads.

No single industry spreads out so much, by so few, too so many, than general and combined public outdoor recreational uses.

Colorado passed a game damages bill, H.B.1235 didn't ask that damage payments be made by the "general fund" or general public who IS the main benefactor of this $589,200,000.00 yearly enterprise, is exactly where the Lamm Administration allowed one of the greatest injustices ever conceived in outdoor history to pass. Not that the sportsman has to pay, but to demand that he must, rather than the public who's welfare is best served by wildlife and by outdoor sports-persons is where the traitors struck.

Cattlemen, and Sheepmen did not care to point out, under Colorado Law, resident wildlife IS THE PROPERTY of the state for use and benefit of ALL people. (Colorado Law 1973) Neither did the state representatives!

Regardless, Wildlife IS held in public ownership and being owned BY THE PEOPLE AS A WHOLE (not sportsmen only) and having economic values which the public is the primary receiptiant, damages by wildlife in any idiot's logic IS the public's responsibility and NOT that of just outdoor users.

Regardless, Colorado is NOW paying damage claims NOT out of the general fund.
This is politically and morally wrong. If the U.S. Fish and Wildlife Service doesn't incorporate strict and full land fencing, initially, concerning this refuge, much damage may result. We speak not of high fencing where migration may be necessary, nor of tight fencing, but a fence that keeps all livestock out of habitat

and wildlife's harms way.

"Who", are the cattlemen suing when they make wildlife claims? Sportsmen or the public? This ruse is more clever than what officials understand. Therefore, one can see "other state and federal legislation policies" DO greatly affect every American and cannot be ignored, nor forgotten. Especially in other States such as Monatana who must heed the experiences of Colorado with these people.

Special interests propose that "the sportsmen" maintain the public's wilderness situation by demanding they weave this country a rope of sand. A rope the public cannot use once handed to them.

In 1979, the Colorado Division of Wildlife operated on a budget of only $20 million dollars.

For each .03 cents paid by sportsmen and invested into wildlife management by Montana or Colorado, a $1.00 DOLLAR profit is reaped by the public. This is approximately the same investment/return expended by the U.S. Fish and Wildlife Service. I personally cannot think of any public agencies or servants that do SO MUCH with SO LITTLE. Since wildlife is a renewable resource, (up to a point) the figures would be greater if America tests an expansion policy for PUBLIC WILDLIFE over livestock, made possible only by public participation and a testing model.

Each dollar the Game Departments creates out of simple license fees for the public is reused over 7 times. (In 1978-79 I thought it was only twice, but researched dollars tagged proved this totally incorrect) Its over 7 times.

Anyhow, take the Charles M Russell deer figures for 1983, multiply it by 7 times before that dollar leaves Monatana. Then multiply by 6% the taxes that are created directly or indirectly regardless if a state has no obvious sales taxes for they show up in one way or another. 2100 Deer created $15,352,092.00 worth of reusable dollars before they completely left Montana, and $921,125.52 in taxable income resulted for the Momtana people. In 1983, the U.S. Treasury received only $277,000 in grazing fees. The malfeasence is startling, as follows.

1983 allowed 60,709 AUM months to be allotted and only 23,608 Animal Unit Months of grazing was used on the CMR Refuge. The habitat taken would theoretically support 70,824 Wapiti for a spread of one Elk per 15 acres. This is the maximum this area could support under ideal conditions and terrain. This is a total financial loss to the state of Montana of $588,281,850.00 dollars in order for the U.S. Treasury to collect only $277,000!

It has been researchers direct experience that when less livestock Animal Unit Months are used than what is allowed is indicative of two truths.

1) The stockmen know the land won't support the amount of animals and they would be thin or sickly and they would have to hay them in the area provided due to previous over grazing practices and land characteristics. This does not mean a 40 AUM area didn't have its full capacity. It can get tricky and innocent looking. A stockman can have 30 adult, qualified cows and all 30 can have 30 calves for a total of sixty animals and still not have the total AUM's used. If the habitat is plush for the taking, one could have exactly 40 AUM adult cows with 40 calves for a total of 80 animals and walk away looking legal and abiding, in both cases. Pleased or screaming and the public never knows the difference.

2) The agency which allowed excessive arcade AUM allocations are themselves poor public land managers.

Over 90% of the 1983 cattle were sold out of state which grazed on the RUSSEL REFUGE and each rancher pocketed the people's habitat profits into their private bank accounts. The people of Montana lost more than ever imaginable. Today, the CMR Refuge has only 1600 Wapiti and it could support easily, 5,000 of these high income animals for public consumption and use, not private profiteering.

1983 saw a rifle success ratio of 81% for approximately 370 hunters who harvested 300 Wapiti, reducing the area herd back down to 1600 animals. This number of hunters is small for such a large available area. The national average expenditure is now OVER $500 dollars to harvest one Elk, equals $185,000 created for Montana by this Refuge alone. A very impressive inventory return indeed. This does not include the unsuccessful hunters.

Colorado, resident deer license is $16. There are 533 three cent segments in each license and 2,500 in a $75 dollar license. A cattleman's damage claim is paid THESE MONIES that makes these public benefits possible.

What must be understood, it costs any State $533.33 to pay that $16 dollars into damage claims in the first place because this is what would have been returned to citizens if it had been reinvested into outdoor management protecting and perpetuating it for common good. Sportsmen and conservationist aren't getting value because they aren't attending public meetings and protecting public interests. We have many reasons to seriously suggest a complete fencing policy for the CMR Refuge. Especially the wintering, low-land ranges for the big game herds which really determine land hold-over capacities.
Those of us who have never known (particularily in the west) the deep hunger for wilderness or quality wildlife and habitat....as those back east, or who live in choked smogged cities such as Dallas, New York, Columbus, Los Angeles, Pittsburg, Boston, or Washington D.C. are LESS WILLING to make strong efforts towards sound national decisions that ARE in the better interest of "all the people."

We than wonder in dismay when those who have always yearned and suffered for wilderness do make them, why THEY never considered the individual, when WE individuals find it difficult to think and act in terms "of the people, by the people, and for the people," in the first place.

Often the man with the moral courage to speak openly and honestly agains't familiar or publicly unfamiliar forms of labor when it is wrong, is the only man anxious to do effective work for labor and government when labor and government is right. The "image" that the western rancher is wildlife responsible has been untrue since inception.

IT'S FOR THESE REASONS THAT THIS TEST SITE HAVE ALL LIVESTOCK BANNED FROM IT AND THE RECREATIONAL VALUES THAT INCREASE BECAUSE OF THIS ACTION BE COMPARED-USED IN ECONOMIC STUDIES FOR THE FULL BENEFITS OF ALL PEOPLES.

No cow employs as many people or puts as much money into THIS STATE'S economy or cash registers and tax rolls as ONE Wapiti or Mule Deer does. This is fact, fact, fact, fact!

The truest AXIOM this researcher can impart is: "Its impossible to put livestock on PUBLIC LANDS where they consume more valuable wildlife habitat and AMERICANS don't suffer. Its impossible."

No one should be permitted to take grasses belonging to wildlife under conditions of an ever shrinking habitat and wildlife inventory. (This also applies to dams that don't have fish latters) Its pathetic fiscal mismanagement. The realistic decision must be made. Livestock should be banned. The question must be answered. Is it alright for the public to be bankrupt and not an individual?

ONE COW STARVES OUT: 3.1 Elk (EACH MONTH) (OR FIVE SHEEP)
ONE COW STARVES OUT: 6.3 Deer
ONE COW STARVES OUT: 5.0 Moose
ONE COW STARVES OUT: 6.8 Bighorn Sheep
ONE COW STARVES OUT: 6.8 Mountain Goats
ONE COW STARVES OUT: 14.8 Antelope

*Above facts From page 41, table of contents for chapter 17 damage caused by big game, agreed upon by the Colorado Division of Wildlife, The Cattlemens Association, The Sheepgrowers, and The Orchard Grower members in meetings caused by HB 1235 for compromise and mitigations of values and losses, 1979.

Since all representatives AGREED to these established damage facts, "THE U.S. Fish and Wildlife Service can". Research by the finest minds and men in this country have proven them.

3.1 Wapiti are worth $25,749.38 to the public.
6.3 Deer are worth $6,579.45 to the public. (Guess who "the public" is?)
5.0 Moose (moose newly introduced into Colorado)
6.8 Bighorn Sheep are worth $112,183.68 to the public
6.8 Mountain Goats are worth $14,824.00 to the public
14.8 Antelope are worth $5,101.29 to the public.

These LOSSES are for one month of grazing by just one cow or each AUM.

The malfeasance is, these losses AND DAMAGES are SIMPLE PROFITS converted by grass and WILDLIFE on OUR LAND, BY ONE COW which CONSUMES the same grasses America should be using more wisely, but delivers them back to ONE rancher who generally employs only himself to fatten his own bank account.

The principle that public rights come first and special interests second; must never be deterred from when the quality of PUBLIC lands, Habitat, Wildlife and the public welfare are jeopardized; and when values received don't equal the PUBLIC LOSES. This is legalized immorality agains't the PEOPLE, condoned through ignorance of facts and the fear to take on the issues.

Today, we're controled by industrialized governments, or not as bravely admitted too by others, as truly "corporate controlled governments" which in truth is the perfect freedom for the strong to wrong the weak. As a public, and as a people, we are weak.

The common sportsperson is the weakest entity in America. What he actually is, is just another citizen and thats all. He "thinks" he's organized under our constitution and would be if he was active under it. Ask any citizen what club organization he is paying dues. The answer generally is NONE.

Yet as an individual, he pays his way pursuing the outdoors more generously than any other, and as he pays and pays and pays....he ends up being this Nations greatest philanthropist of which more NON-SPORTSMEN benefit than what are sportsmen.

He's usually the very last to find out about the powers gobbling up his world, and its only the GENERAL PUBLIC and it's willingness to cooperate that sportsmen have what "we the people" are willing to give and are AMERICAN enough to work for.

The population doesn't influence the newspapers or control how television affects them, but there is no other way to inform the very public which subscribes to "his services and who is willing to always take his money."

President Theodore Roosevelt said it best: "Wild game not on private property DOES belong "to the people" and the only way in which "the people" can secure their ownership, values, and THEIR habitat is by protecting it in the interest of ALL agains't the VANDAL FEW.

In 1979, for instance; $800,000.00 dollars worth of materials was furnished to private landowners throughout Colorado to protect "their ranches" from wildlife as reported by Bob Tully, Chief of Wildlife Services for the Division of Wildlife.

It took 50,000 resident deer licenses to provide this money. Pathetic.

This loss is over $200,000,000.00 million plus the lost taxes to the state and nation.

What sportsmen don't realize is WE can say things that politically directors cannot. No one deserves to take such beatings at open meetings from private groups that these trusted men do.

Its not hard to show perpetual cases of malicious overgrazing or land erosion due to it. The BLM or the ranchers don't repair it, so "Over-greed-grazing" isn't a rumor. With it are lost billions of dollars more practical big game herds and quality fishing and outdoor recreation inventories should provide. "Multiple Use" is used in excess to rip our country's habitat off.

1) The American housewife has never received one cent of discounts from public

grazing practices in stores.

2) More farmers would be willing to raise beef if the public provided the incentive to do so. A competitive market would result because ancient grazing allotments are tied up to favor a few and the public is subsidizing the few agains't the agricultural majority to become rich.

3) All cattlemen can't bid on these grazing permits and they are NOT "rights".

4) Beef raised in other states do it on their own land. They don't have public grazing and they do it better than most others and at a profit. Public grazing on PUBLIC lands is socialistic and Unamerican.

5) This practice is not as great a sin agains't free enterprise as it is agains't "fair enterprise."

The situation isn't much different than that perpetuated upon this nation's people by the oil companies. Whereas; BOTH industries DEMAND that the people subsidize THEIR abilities to become rich. If YOU DEMAND they remove their hands out of your pockets, they will threaten the public, committees, and our leaders as "fear and threats" is the proven way now for a spoiled industrial child to get its own way.

As of now, Cattlemen in many western states are demanding when Wildlife, eats the public's habitat, where a rancher's cattle wanders, that they pay him damages that which the public's wildlife eats, because of the low grazing dollars a month he purchases in his mind as "grazing rights."

Montana's Dept of Fish, Wildlife and Parks received in 1983, as reported to this researcher on 26 Apr 84 by Colleen Connors:

$5,998,966.00 Dollars in Elk License fees.
$7,276,068.00 Dollars in Deer License fees.
$ 477,800.00 Dollars in Antelope License fees.
Total: $13,752,834.00 dollars.

Because of these three species alone, the Montana Dept Wildlife will be able to reinvest these dollars in 1984 which will result direct profitable benefits to be shared by all Montana citizens for a minimum of $458,427,800.00 in spendable income. This is almost one half of a billion dollars all due to only three Wildlife Species. The indirect taxes which will be shared statewide will total in excess of $3 Billion Dollars before all monies finally leave the state created by such a wonderful inventory....WILDLIFE! It may not be much when shared by every town, city and citizen; but it helps to be able to reuse money drawn by marketable wildlife resources.

Again, the average is for each .03 cents invested by a Division of Wildlife or Federal agency into recreational resources, the public receives a $1 dollar, direct, profitable, spendable income.

Other personal benefits AMERICANS receive deals with fishing.

These are the net benefits for 1979 in the state of Colorado.

1) Cold Water Stream Fishing................$103,110,000.00 DOLLARS
2) Warm Water Fishing........................$13,257,000.00 DOLLARS
3) Cold Water Lake Fishing..................$132,257,000.00 DOLLARS
4) Total Funds received by public..........$367,937,000.00 DOLLARS
5) Total Taxes created for state...........$72 Million.

There is no such thing as good trout, steelhead, or salmon fishing unless there is stable habitat above it. Yet, Ranchers continue to graze with no regard to what water drainage damage their livestock wallow or pollute in.

An insult to the public is Public Habitat is referred to as "RANGE" in all federal referances now under Multiple Use. No public corrections to these "improper referrals" has been sent any agency. Wilderness is NOT "range" or cowboy country. "Habitat" is now "word polluted." I request the U.S. Fish and Wildlife Service remove this word when referring to our outdoor lands, its plants and grasses in all future references to our natural, wildlife habitat.

What IS the fair price for grazing cattle or sheep in this modern age of high interest rates and exchanges?

There isn't any.

As it is, livestock ranchers don't put a thing back, won't pay their own way, and hate paying fees." Its the same with the electrical projects which won't construct fish ladders and have exterminated Salmon and Steelhead spawning travels up rivers. (John Day Dam perfect example) They are willing to take the power of water and the profits, but don't care to give the common courtesy of allowing WILDLIFE VALUES continuing up river which releive public tax burdens. The fishing dollars lost are criminally staggering.

Its the same reference with ranchers. If you ask ANY rancher if you could graze your cow on his land for $4 bucks per month, he would throw you off HIS LAND so fast you would bounce forever. Since he agrees this is unfair to him, why shouldn't we accept he has nothing but contempt for outdoor recreation as it is?

Politically, Outdoor wilderness and all that is associated with it has been looked upon and handled by "ILLUSIONARIES." Few men are willing to recognize and fight agains't "real" Outdoor PERSECUTIONS. Simply because they fear agriculture and of being looked upon as "radicals" who have not ever treated them good enough.

Accordingly, a few ranchers who wish to withhold public, upland game hunting in the area on private lands is not a valid or strong enough reason to not impliment full management controls for the Russell Refuse area. This is not an issue for compromise because the true rancher sportsman will use the Russell Refuge and will allow small game hunting by respectful, considerate, permission asking sportsmen.

Standing up agains't dangerous Agricultural Politics is like saying one doesn't like motherhood. This is a classic "illusion" agriculture has Federal Agencies believing, that they are pure apple pie. Yet, it is my opinion cattle on wilderness land is not agriculture, but rather Agri-rape-ture. The difference between the working man and bumming it at the expense of others.

Many ranchers carry pickup rifles killing coyotes, eagles, or anything that should ever get near a cow or sheep on public land. (With no regard for seasonal regulations) They have such little respect for the very symbol of America, (the Eagle) they have been one of the major factors for its decline.

Federal trappers are hired to trap and kill many forms of wildlife that compete. Poisoning, shooting from aircraft, trapping, are but a few Federal Programs. In short, once these Federal Agencies are born, they are almost impossible to stop or disband. They are the closest things in the universe that have solved the secrets of perpetual motion.

When you see fishermen, look upon them with content and with the knowledge they are investing from $40 to $250 dollars a day to do his sport. ($250 in Washington/Oregon State a day Steelhead fishing for an out-of-Stater for example)

The one, who without justification denies another "gentleman sportsfisherman" a right to fish; who has no proofs that person is a damage or would be so, is inconsiderate himself to the better interests of his neighborhood, and area.

Most ranchers care less that "a fisherman" does mean $40 a day or more of real, and actual money to his state or areas economy. (And, in most other cases, they don't realize this and admit to that)

Whereas: His livestock are busily eating "that fisherman's wildlife habitat" which would support over $24,000 dollars worth of ADDITIONAL elk (PER A.U.M.) each year, per cow, times the amount of months each cow is allowed to graze on HIS LAND.

Who then, has the better right and the better cause to bar whom, from what?

Ranchers have given me some of the very thoughts that are in this researched letter. I remember one in particular. This fellow explained it best to me over a cup of coffee in Saguache, Colorado (pronounced, "sa'watch") in 1978.

QUOTE: "We as a State have more to gain than what we would lose if we kicked every last Jack one of them out. What the public doesn't realize, is when they take cattle and especially sheep off of big game habitat, beautiful things begin to happen. The brouse explodes like a nova and the land values are returned to tens of thousands of people....and not just one. I'd call that a hell of a trade-off......economically. But tell any association that I said this George, and I'd have to deny it."

"Ride the LaGarita Wilderness sometime and see yourself a miracle. (I did later, and God...was he right!) Used to graze my cattle up there myself and made a ton of money. A ton of it! I had a license to steal and I don't care if I ever have another head in that great country again. It's too nice to screw up anymore. I hope its kept that way forever. We certainly need more of it."

"The days are past where a guy can go around with an invisible sign over his head saying, "I'm a rancher!" and its supposed to give them immunity or something George. The sooner the public realizes we are not special, with the blue eyes and pulled down cowboy hat looking at the distant horizon....the healthier I think it will be for everybody."

Question: "What happens to the savings that the consumer receives by letting ranchers graze on public wildlife habitat?"

"HA! We put them into OUR pockets! What savings? The consumers lost those the second the government allowed us to public graze under the disguise of MULTIPLE USE and the day the very first cow was sold at market. Don't be ridiculous. Thats a federal bureaucracy con-job to keep their jobs with witty catch-all phrases, keeping open many, many doors and options. Always was. Always will be!"

"You. Me. Everything and all life comes from grass. Grass in our high country IS the only substance of life for our magnificent outdoor critters and we continue to allow stupid decisions to strangle the only habitat capable of sustaining them. When I was grazing public range, I didn't care. Hell, why should I? I'm getting something for nothing. We cattlemen have the government politicians by the throat. What you have? You and the public?......nothing. Incompetent? You betcha. It all comes down to who's ox is gored and who can hollar the loudest, doesn't it? Cattlemen have a great set of lungs. I used to hollar the loudest. I know." UNQUOTE

So it is, we are led to believe we cannot raise cattle without taking AMERICA'S WILDLIFE HABITAT.

The Wapiti situation was best explained by President Teddy Roosevelt.

"Next to the bison, the wapiti is of all the big game animals of North America the one whose range has most decreased. Originally it was found from the Pacific coast, east across the Alleghanies, through New York (where your sitting right now reading this letter SIRS,) to the Adirondacks, through Pennsylvania into western New Jersey, and far down into mid-country of Virginia and the Carolinas. It extended northward into Canada, from the Great Lakes to Vancouver; and southward into Mexico, along the Rockies."

"The Wapiti is the largest and stateliest deer in the world. A full-grown bull is as big as any steer and its antlers are the most magificent trophies yeilded by any big game animal of America, save the giant Alaskan Moose."

Where are your Wapiti New Jersey, Pennsylvania, New York, and the Carolinas? Where are you going to hunt them?

The west, thats where.....and we welcome to share all that remains.

Is it any wonder than, that the peoples of a whole nation which once had such grand creatures should now take a hard, close, modern look at ANYTHING and EVERY PRACTICE that diminishes its availability or public habitat by one square foot, and its WILDLIFE by ONE animal?

We have been giving advantages to poor, ill managed, and outdated wasteful grazing practices and policies. We are not reporting or doing our homework. We must understand theres nothing wrong in thinking of wildlife in terms of dollars and cents, AS A BUSINESS, which makes society money. Lots of money, and in terms of money, that is money and inventory now is in trust, with the U.S. Fish and Wildlife Service.

Whether made with pictures, campers, bird-watchers, vacations, fishing, hunting, boating, vacationers, or hikers. It's all the same. Without wildlife on our lands, in our streams and lakes, all society is poorer for it.

The fact that a man can hunt with the realistic hope that a large Elk will reduce his grocery bills, does have merit in his best economical outdoor interests as a whole.

The BLM or Cattleman's Associations cares not, to point out, that it literally costs more than $4 to care and feed a canary bird per month?

ONE COW eliminates the habitat, in one season, that supports $128,746.87 dollars in ELK values from previous examples.

In nature, nothing converts wildlife brouse into protein as efficiently as a Mule Deer or Elk can.

I have heard federal land managers, (who keep positions "by complicating" the use of AMERICA'S high country) ..... will make you believe that cattle and rotation grazing is better for public land when placed during certain times of the year on wildlife brouse and habitat.....because, when they graze (believe this or not!) the cattle's feet knock more seed to the ground and thereby INCREASE "range" growth.

Is this another misleading idea under the "Multiple Use Scheme" of things?

You bet it is, because there's NOTHING ANY COW CAN DO with four legs that three ELK with 12 legs, or six DEER with 24 legs, or 14 ANTELOPE with 56 legs can't do better.

All recent federal wilderness bills now going before the senate have provisions

allowing cattlemen access to wilderness habitat so they can continue stealing it. And since no one has explained what wildlife habitat and its life values to our economy are by comparison, the con job continues.

Not that long ago, Theodore Roosevelt had the courage to set aside West Yellowstone National Park for the children of the future. We are those very children of the future he was thinking of. Yet, with each passing year, it becomes but a lesser part of what it originally was. The roads, buildings, parking lots and areas continue to erode away its once great "naturalness." Today, its but an outdoor zoo.

As our population grows, the daily demands upon wilderness and our big game herds increases and increases and we haven't been wise enough to provide for our future needs until the Carter Administration set aside wilderness areas in Alaska. It has every chance of being his true legacy.

The public doesn't understand how much of their paychecks reflect outdoor recreation dollars and few outdoor conservation writers are doing their homework.

Multi-billlions of dollars pass through Colorado and Montana yearly because of wildlife and its habitat, causing over 8 BILLION dollars each in social monitary, and national activities.

HABITAT IS a business. WILDLIFE is a business. The private American needs to understand the truth. We must start using $$$sense$$$ to fight for Wildlife: An American Ideal & Her Values.

CONCLUSIONS:

I find the EIS for the C.M.R. Refuge arcade.

For example, the prairie dog towns are an advantage considering they can support and save the black-footed ferret. The exchange of a million head of cattle to save the last pair of ferrets is justified. Coyotes probably abound here due to the prairie dog population and any poison controls should be removed. Incorporation of breeding pairs of black-footed ferrets is a strong arguement to pursue full, non-livestock standards in the face of a more serious, priority problem.

The financial worth and enhancement of the Sharp-tailed Grouse foregoes all other problems and worths at this time.

The fact that buffalo incorporation is mentioned is not sound at this time. Buffalo fetis is as wasteful to grass propergation as cattle. Elk and Deer fetis is pelletisized, indicating high energy exchanges from grass and browse than cattle types such as buffalo, bison, etc. This is why the same amount of brouse supports more big game animals than domestic species or types. Mountain Goats, Deer, Wapiti, Big Horn Sheep, pelletisize brouse which results in MORE valuable animals that use less browse than "plopper type fetis" animals do. We recognize the humor available here in spite of the truth not before being put forth as bluntly.

The sharp-tailed grouse need thicker, higher grass range to increase. The habitat

comes first before all other matters. Than the grouse will follow. Than it may be time to incorporate bison on a strict, non-lowering grass height basis.

The black-footed ferret values come before fox values.

We find the socioeconomics not realistic or factual. INVENTORY increases of wildlife species with no livestock competitions would indeed increase the areas population and social financial intercourse. The ignoring of coming events that a high success ratio area would not be impactive is nieve. That it would not receive national sports magazine write-ups and the inventory of Wapiti, Big Horns, Deer, Grouse, etc. not be sold, is again not proper.

There is no sense incorporating or "expecting the full big horn sheep numbers possible" until the total elimination of any and all domestic sheep is assured with guarantees of no future reintroductions. The value of monitary worth of huntable big horns to the area would be a pleasant surprise for everyone in the near future.

The success of any management policy that will increase wildlife and especially the big game herds is the lower valley habitat for wildlife use in the spring, winter months between January, February, March and April.

It is THIS AREA of brouse that must be fenced and protected from ALL livestock as soon as possible and in my opinion, the entire refuge. Any compromises concerning these vitally important carry-over areas would be folly and foolish. It is of this researcher's experience that any one proposal is not good enough by itself and by themselves still compromise the habitat, the land, and the wildlife goals desired.

The U.S. Fish and Wildlife Service should take a more clear-cut stand and boldly state all the primary purposes of any and all new policies. For example:

If the welfare and safety of the Fort Peck Lake and Dam is at stake due to siltation resulting from poor habitat anchoring of the soil and terrain, it should be stated. Its evident the usefulness of the surrounding ponds are short-lived due to the local conditions from overgrazing and this water resource, if it is not in the expected condition, must be protected.

Of all things said, the U.S. Fish and Wildlife Service must hold fast that its the HABITAT FOODS that come first and foremost. From it, all things follow and all goals in wildlife values and habitat will be assured. Since the history of the Charles M Russell Wildlife Refuse proves past policies are not in the best interest of this area, a bold, new directive and initative is needed and will be followed. That if there is damage that can no longer be tolerated in the people's best interest, it must be stated flatly.

Its obvious, facts show this area to be much more important when weighed against the wants of a few stockmen who are not contributing to the well being of this Refuge. It should be flatly stated they will be banned for more important reasons and what they are.

I only wish I had the time to point out how much more valuable the CHARLES M

RUSSELL REFUGE could be to Montana's economy, not including the nation. It can be greater and more productive than any have imagined, but it will take an initative of policies not previously incorporated openly. Its evident, the condition of the surrounding terrain is not open for compromises in this instance. This should be stated honestly and would be accepted.

The previous depth of the Fort Peck Lake floor is not shown or illustrated today as compared to when it was new. What is that depth difference now? Is this indeed a serious, and pending dangerous problem in the future if something isn't done at this time?

Is not the habitat and what is happening in this area of a more serious nature at this time than the side benefits of increases in wildlife? In otherwords, are there any other reasons more serious than the decreases in endangered species in this area? If so, what are they? What are all the deplorable findings concerning the Charles M Russell Refuge area, known and unknown at this time? Have they all been fully and honestly explained and admitted to in the Environmental Impact Statement at this time?

Is a fuller and more direct review actually needed and is a more modern approach and explaination needed concerning any previous findings or new findings?

Is the word, "Environmental" understood as it applies to the Refuge by all concerned and how it is being used? Does its intent mean, habitat, Fort Pecks condition, that which deals with only nature and the land, or is it also necessary to include social and human benefits directly or indirectly?

Therefore: Is any or all of the above in harmony to the main goal and the E.I.S. and has this statement addressed that issue honestly, openly, and fully?

What is the main goal concerning this refuge and why? Is it only habitat or a combination of siltation or some other serious factors not plainly explained at this time to the public?

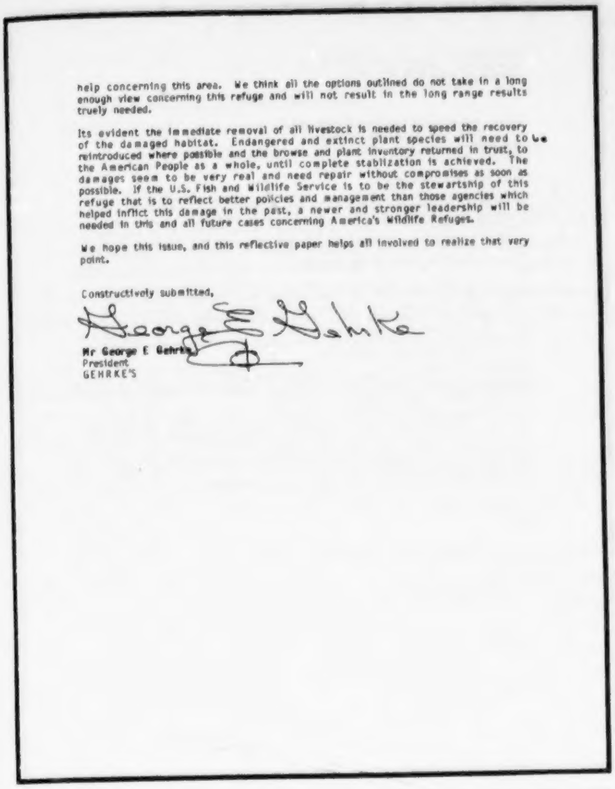
MANAGEMENT CHOICES OFFERED

Its obvious, any one choice offered as a management outline for this area is not adequate because the dedicated goal is compromised.

Its evident the multiple use concept is destructive and dangerous and not applicable.

The broad objectives of "THIS REFUGE SYSTEM" is particular, for specific reasons. Its possible endangered lands and species are seriously compromised at this time which is grounds enough to justify a strong management policy that none of the choices, by themselves provides at this time.

This researcher is not qualified at this time to outline the best program for this area's habitat, rare species protections and goals. We question however all the choices as being the complete tools, by themselves, as being the correct answer at this time. We suspect its sounder to ask congress for more liberal and forceful



help concerning this area. We think all the options outlined do not take in a long enough view concerning this refuge and will not result in the long range results truely needed.

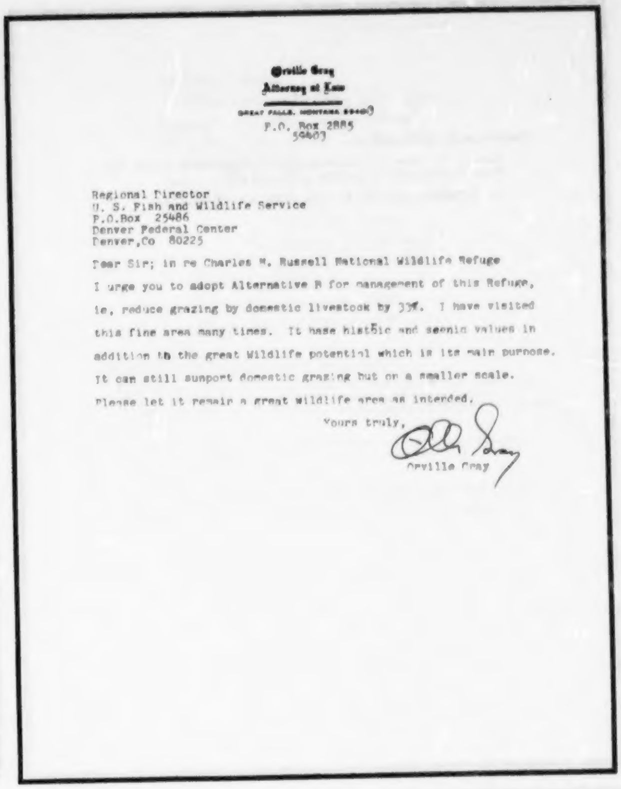
Its evident the immediate removal of all livestock is needed to speed the recovery of the damaged habitat. Endangered and extinct plant species will need to be reintroduced where possible and the browse and plant inventory returned in trust, to the American People as a whole, until complete stablization is achieved. The damages seem to be very real and need repair without compromises as soon as possible. If the U.S. Fish and Wildlife Service is to be the stewartship of this refuge that is to reflect better policies and management than those agencies which helped inflict this damage in the past, a newer and stronger leadership will be needed in this and all future cases concerning America's Wildlife Refuges.

We hope this issue, and this reflective paper helps all involved to realize that very point.

Constructively submitted,

George E Gehrke

Mr George E Gehrke
President
GEHRKE'S



Orville Gray
Attorney at Law
GREAT FALLS, MONTANA 59403
P.O. Box 2885
59403

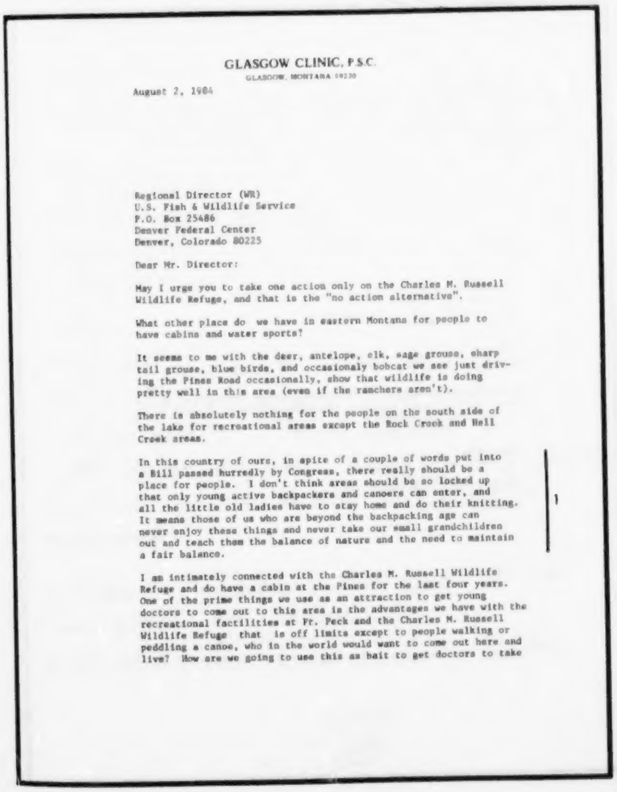
Regional Director
U. S. Fish and Wildlife Service
P.O.Box 25486
Denver Federal Center
Denver,Co 80225

Dear Sir; in re Charles M. Russell National Wildlife Refuge

I urge you to adopt Alternative B for management of this Refuge, ie, reduce grazing by domestic livestock by 33%. I have visited this fine area many times. It hase histoic and scenic values in addition to the great Wildlife potential which is its main purpose. It can still support domestic grazing but on a smaller scale. Please let it remain a great wildlife area as intended.

Yours truly,

Orville Gray



GLASGOW CLINIC, P.S.C.
GLASGOW, MONTANA 59230

August 2, 1984

Regional Director (WR)
U.S. Fish & Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Mr. Director:

May I urge you to take one action only on the Charles M. Russell Wildlife Refuge, and that is the "no action alternative".

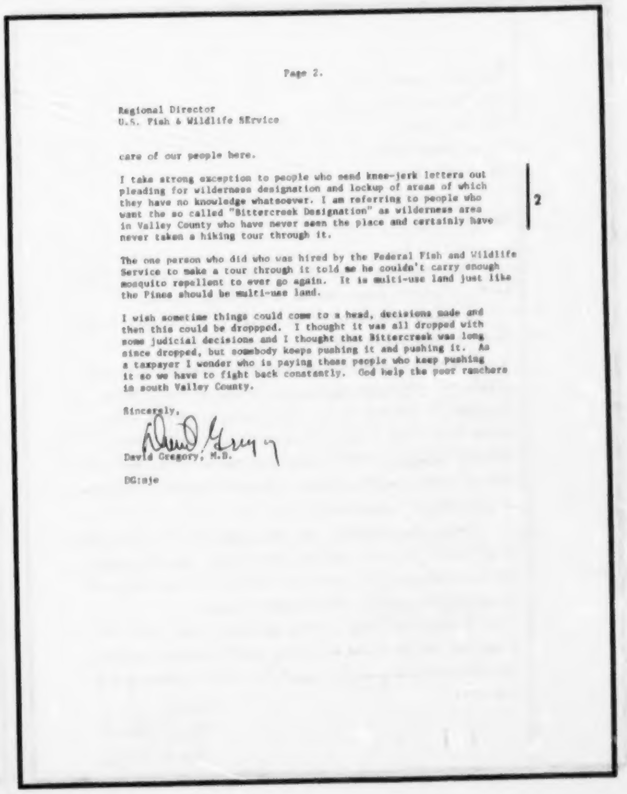
What other place do we have in eastern Montana for people to have cabins and water sports?

It seems to me with the deer, antelope, elk, sage grouse, sharp tail grouse, blue birds, and occasionaly bobcat we see just driving the Pines Road occasionally, show that wildlife is doing pretty well in this area (even if the ranchers aren't).

There is absolutely nothing for the people on the south side of the lake for recreational areas except the Rock Creek and Hell Creek areas.

In this country of ours, in spite of a couple of words put into a Bill passed hurredly by Congress, there really should be a place for people. I don't think areas should be so locked up that only young active backpackers and canoers can enter, and all the little old ladies have to stay home and do their knitting. It means those of us who are beyond the backpacking age can never enjoy these things and never take our small grandchildren out and teach them the balance of nature and the need to maintain a fair balance. 1

I am intimately connected with the Charles M. Russell Wildlife Refuge and do have a cabin at the Pines for the last four years. One of the prime things we use as an attraction to get young doctors to come out to this area is the advantages we have with the recreational factilities at Ft. Peck and the Charles M. Russell Wildlife Refuge that is off limits except to people walking or peddling a canoe, who in the world would want to come out here and live? How are we going to use this as bait to get doctors to take



Page 2.

Regional Director
U.S. Fish & Wildlife SErvice

care of our people here.

I take strong exception to people who send knee-jerk letters out pleading for wilderness designation and lockup of areas of which they have no knowledge whatsoever. I am referring to people who want the so called "Bittercreek Designation" as wilderness area in Valley County who have never seen the place and certainly have never taken a hiking tour through it. 2

The one person who did who was hired by the Federal Fish and Wildlife Service to make a tour through it told me he couldn't carry enough mosquito repellent to ever go again. It is multi-use land just like the Pines should be multi-use land.

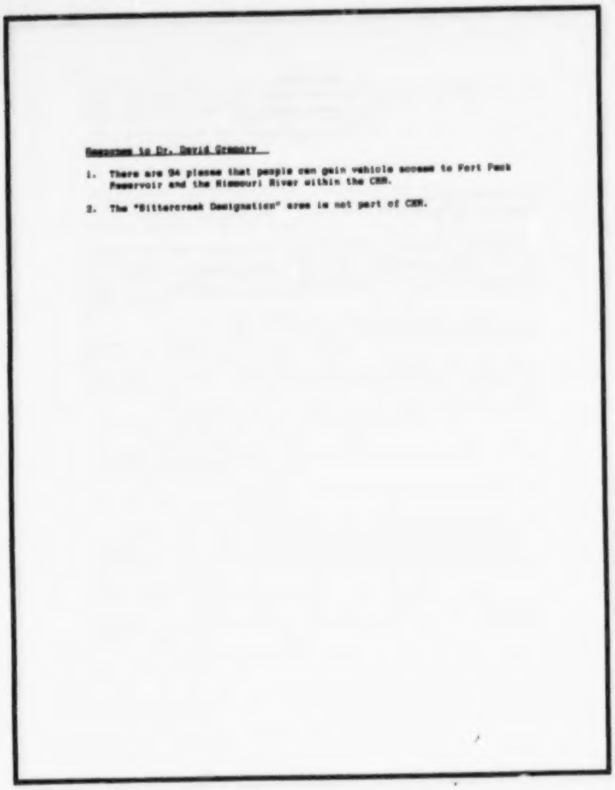
I wish sometime things could come to a head, decisions made and then this could be droppped. I thought it was all dropped with some judicial decisions and I thought that Bittercreek was long since dropped, but sommbody keeps pushing it and pushing it. As a taxpayer I wonder who is paying these people who keep pushing it so we have to fight back constantly. God help the poor ranchers in south Valley County.

Sincerely,

David Gregory

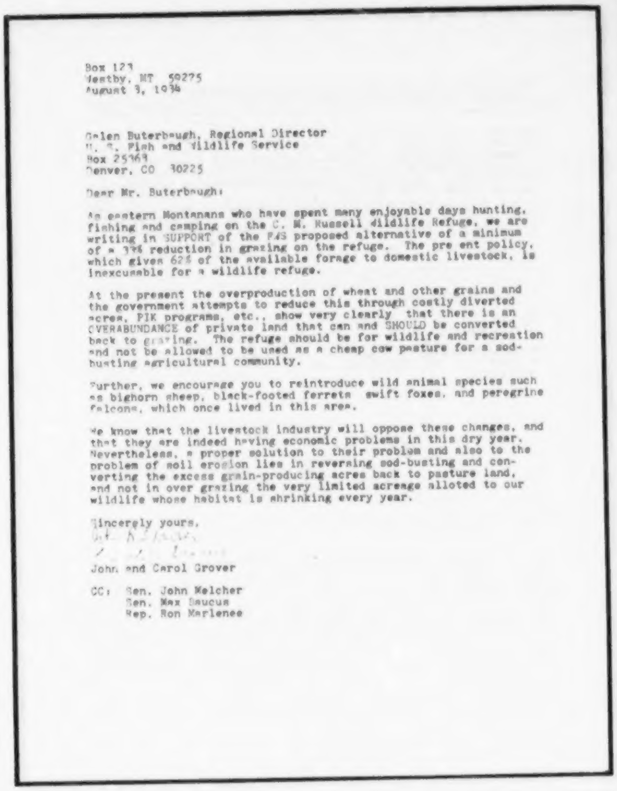
David Gregory, M.D.

DG:mje



Responses to Dr. David Gregory

1. There are 94 places that people can gain vehicle access to Fort Peck Reservoir and the Missouri River within the CMR.
2. The "Bittercreek Designation" area is not part of CMR.



Box 123
Westby, MT 59275
August 3, 1984

Galen Buterbaugh, Regional Director
U. S. Fish and Wildlife Service
Box 25369
Denver, CO 80225

Dear Mr. Buterbaugh:

As eastern Montanans who have spent many enjoyable days hunting, fishing and camping on the C. M. Russell Wildlife Refuge, we are writing in SUPPORT of the FWS proposed alternative of a minimum of a 33% reduction in grazing on the refuge. The present policy, which gives 62% of the available forage to domestic livestock, is inexcusable for a wildlife refuge.

At the present the overproduction of wheat and other grains and the government attempts to reduce this through costly diverted acres, PIK programs, etc., show very clearly that there is an OVERABUNDANCE of private land that can and SHOULD be converted back to grazing. The refuge should be for wildlife and recreation and not be allowed to be used as a cheap cow pasture for a sod-busting agricultural community.

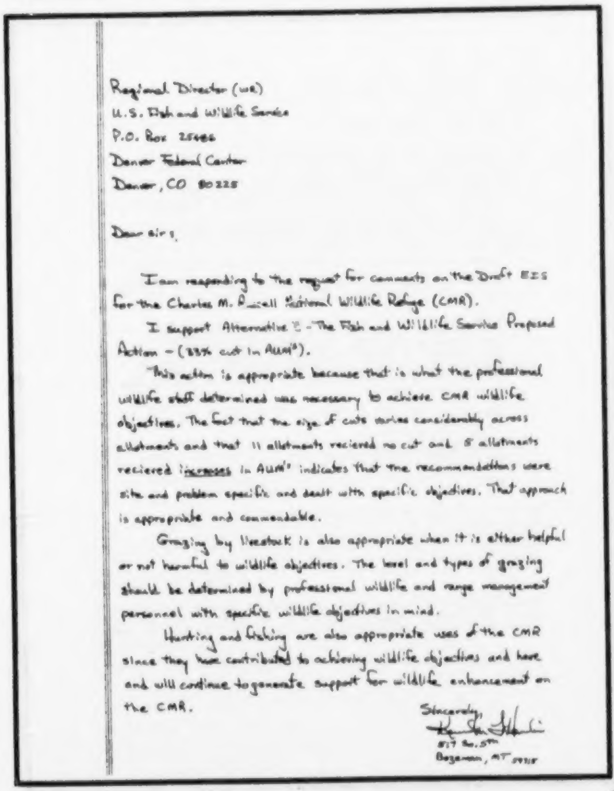
Further, we encourage you to reintroduce wild animal species such as bighorn sheep, black-footed ferrets swift foxes, and peregrine falcons, which once lived in this area.

We know that the livestock industry will oppose these changes, and that they are indeed having economic problems in this dry year. Nevertheless, a proper solution to their problem and also to the problem of soil erosion lies in reversing sod-busting and converting the excess grain-producing acres back to pasture land, and not in over grazing the very limited acreage alloted to our wildlife whose habitat is shrinking every year.

Sincerely yours,

John and Carol Grover

CC: Sen. John Melcher
Sen. Max Baucus
Rep. Ron Marlenee



Regional Director (WR)
U.S. Fish and Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, CO 80225

Dear sirs,

I am responding to the request for comments on the Draft EIS for the Charles M. Russell National Wildlife Refuge (CMR).

I support Alternative E - The Fish and Wildlife Service Proposed Action - (33% cut in AUM's).

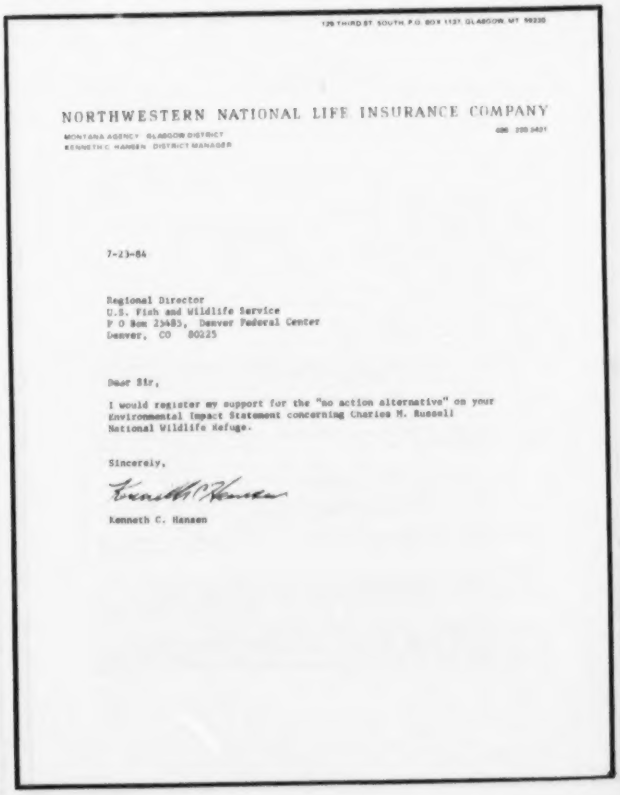
This action is appropriate because that is what the professional wildlife staff determined was necessary to achieve CMR wildlife objectives. The fact that the size of cuts varies considerably across allotments and that 11 allotments recieved no cut and 5 allotments recieved increases in AUM's indicates that the recommendations were site and problem specific and dealt with specific objectives. That approach is appropriate and commendable.

Grazing by livestock is also appropriate when it is either helpful or not harmful to wildlife objectives. The level and types of grazing should be determined by professional wildlife and range management personnel with specific wildlife objectives in mind.

Hunting and fishing are also appropriate uses of the CMR since they have contributed to achieving wildlife objectives and have and will continue to generate support for wildlife enhancement on the CMR.

Sincerely,

817 So. 5th
Bozeman, MT 59715



129 THIRD ST. SOUTH, P.O. BOX 1127, GLASGOW, MT 59230

NORTHWESTERN NATIONAL LIFE INSURANCE COMPANY

MONTANA AGENCY GLASGOW DISTRICT
KENNETH C. HANSEN DISTRICT MANAGER

7-23-84

Regional Director
U.S. Fish and Wildlife Service
P O Box 25485, Denver Federal Center
Denver, CO 80225

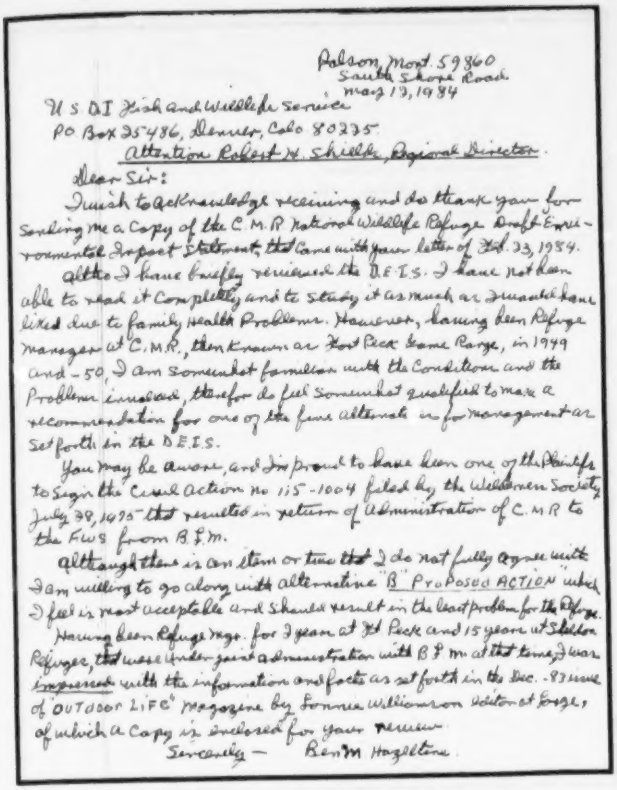
Dear Sir,

I would register my support for the "no action alternative" on your Environmental Impact Statement concerning Charles M. Russell National Wildlife Refuge.

Sincerely,

Kenneth C. Hansen

Kenneth C. Hansen



Polson, Mont. 59860
South Shore Road
May 19, 1984

U S DI Fish and Wildlife Service
PO Box 25486, Denver, Colo 80225
Attention Robert H. Shields, Regional Director.

Dear Sir:

I wish to acknowledge receiving and do thank you for sending me a Copy of the C.M.R. National Wildlife Refuge Draft Environmental Impact Statement, that came with your letter of Feb. 23, 1984.

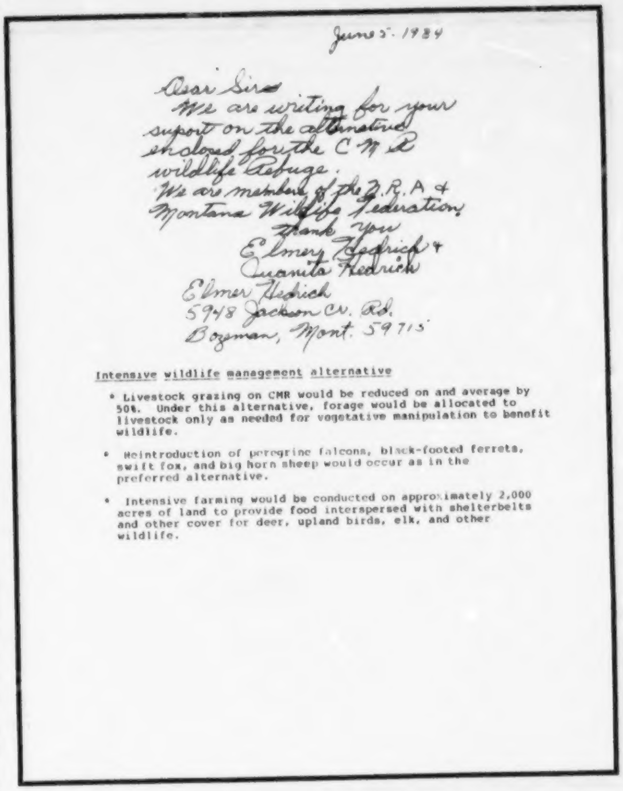
Altho I have briefly reviewed the D.E.I.S. I have not been able to read it completely and to study it as much as I would have liked due to family health Problems. However, having been Refuge manager at C.M.R., then known as Fort Peck Game Range, in 1949 and -50, I am somewhat familiar with the Conditions and the Problems involved, therefor do feel somewhat qualified to make a recommendation for one of the five alternatives for management as set forth in the D.E.I.S.

You may be aware, and I'm proud to have been one of the Plaintiffs to sign the Civil Action No 115-1004 filed by the Wilderness Society July 28, 1975 that resulted in return of Administration of C.M.R to the FWS from B.L.M.

Although there is an item or two that I do not fully agree with I am willing to go along with alternative "B" PROPOSED ACTION which I feel is most acceptable and should result in the least problem for the Refuge.

Having been Refuge Mgr. for 2 years at Ft Peck and 15 years at Sheldon Refuges, that were under joint administration with B.L.M. at that time, I was *impressed* with the information and facts as set forth in the Dec. -83 issue of "OUTDOOR LIFE" Magazine by Lonnie Williamson editor at large, of which a Copy is enclosed for your review.

Sincerely — Ben M. Hazeltine



June 5. 1984

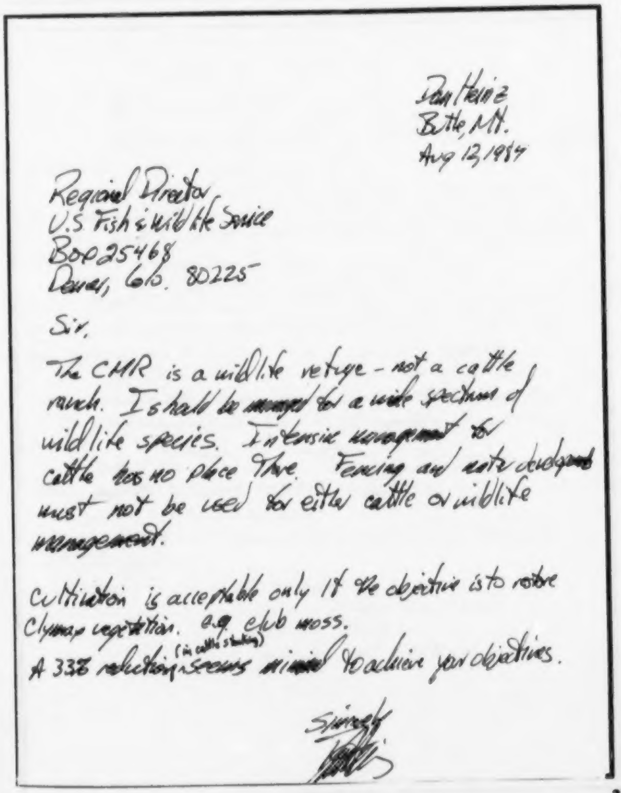
Dear Sirs
We are writing for your suport on the alternative enclosed for the C M R wildlife Refuge.
We are members of the N.R.A & Montana Wildlife Federation.

Thank You
Elmer Hedrick &
Juanita Hedrick

Elmer Hedrick
5948 Jackson Cr. Rd.
Bozeman, Mont. 59715

Intensive wildlife management alternative

- Livestock grazing on CMR would be reduced on and average by 50%. Under this alternative, forage would be allocated to livestock only as needed for vegetative manipulation to benefit wildlife.
- Reintroduction of peregrine falcons, black-footed ferrets, swift fox, and big horn sheep would occur as in the preferred alternative.
- Intensive farming would be conducted on approximately 2,000 acres of land to provide food interspersed with shelterbelts and other cover for deer, upland birds, elk, and other wildlife.



Don Heinz
Butte, MT.
Aug 12, 1984

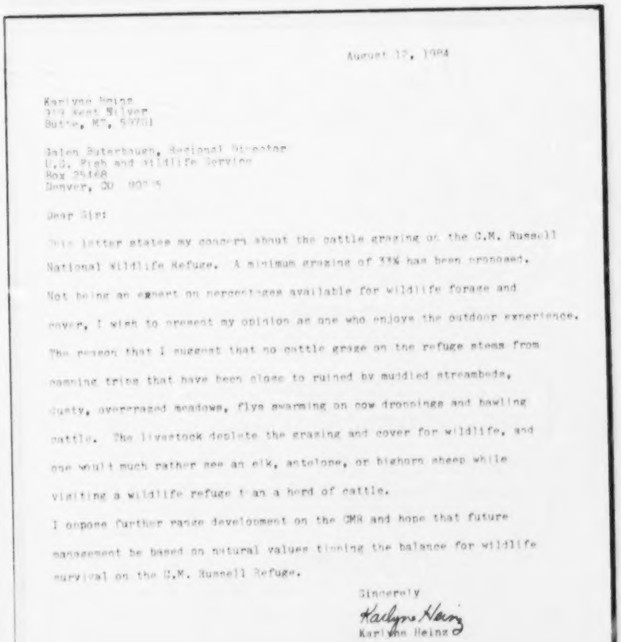
Regional Director
U.S. Fish & Wildlife Service
Box 25468
Denver, Colo. 80225

Sir,

The CMR is a wildlife refuge - not a cattle ranch. It should be managed for a wide spectrum of wildlife species. Intensive management for cattle has no place there. Fencing and water development must not be used for either cattle or wildlife management.

Cultivation is acceptable only if the objective is to restore Clymax vegetation. e.g. club moss.
A 33% reduction (in cattle stocking) seems minimal to achieve your objectives.

Sincerely



August 12, 1984

Karlyne Heinz
319 West Silver
Butte, MT, 59701

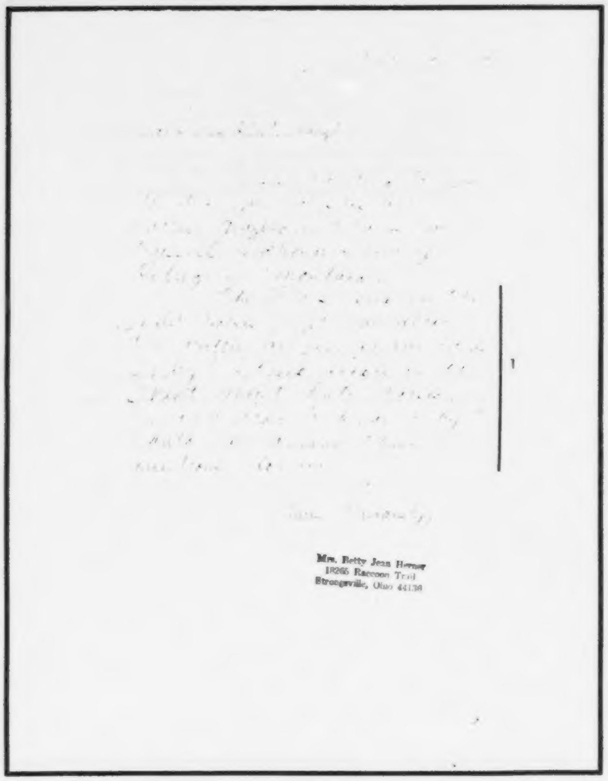
Galen Buterbaugh, Regional Director
U.S. Fish and Wildlife Service
Box 25468
Denver, CO 80225

Dear Sir:

This letter states my concern about the cattle grazing on the C.M. Russell National Wildlife Refuge. A minimum grazing of 33% has been proposed. Not being an expert on percentages available for wildlife forage and cover, I wish to present my opinion as one who enjoys the outdoor experience. The reason that I suggest that no cattle graze on the refuge stems from camping trips that have been close to ruined by muddied streambeds, dusty, overgrazed meadows, flys swarming on cow droppings and bawling cattle. The livestock deplete the grazing and cover for wildlife, and one would much rather see an elk, antelope, or bighorn sheep while visiting a wildlife refuge than a herd of cattle.

I oppose further range development on the CMR and hope that future management be based on natural values tipping the balance for wildlife survival on the C.M. Russell Refuge.

Sincerely
Karlyne Heinz
Karlyne Heinz



[illegible]

[illegible]

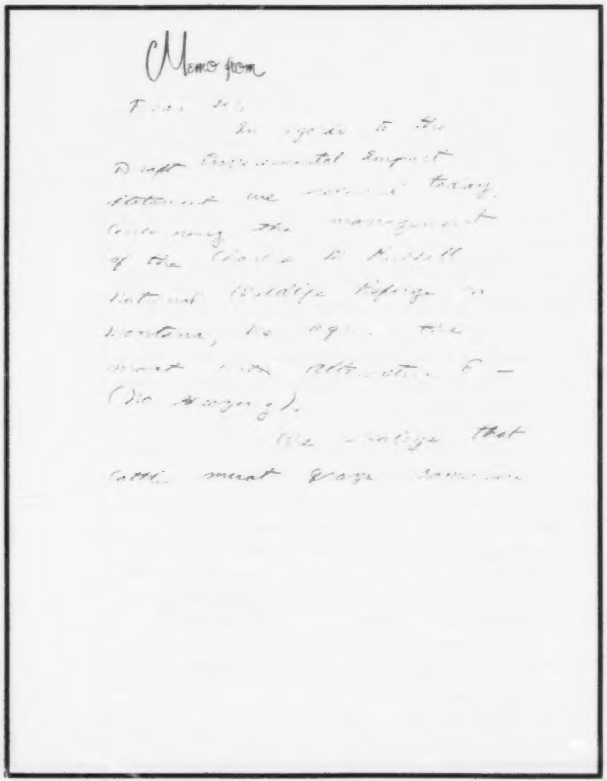
[illegible] Montana. [illegible] 1

Yours Sincerely,

Mrs. Betty Jean Horner
18265 Raccoon Trail
Strongsville, Ohio 44136

Response to Mrs. Betty Jean Horner

1. There are no wild horses on the CMR; therefore, this EIS does not address wild horses. You may wish to contact the Bureau of Land Management concerning wild horses in the West.

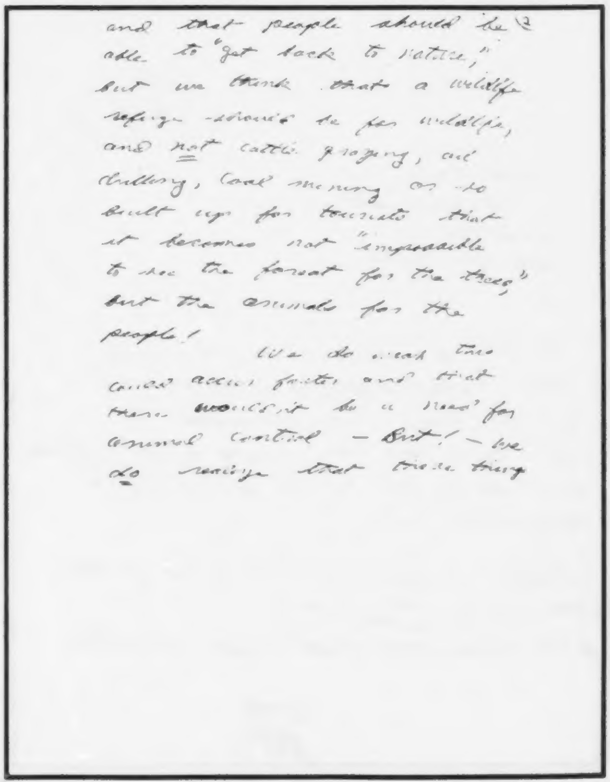


Memo from

Dear Sir,

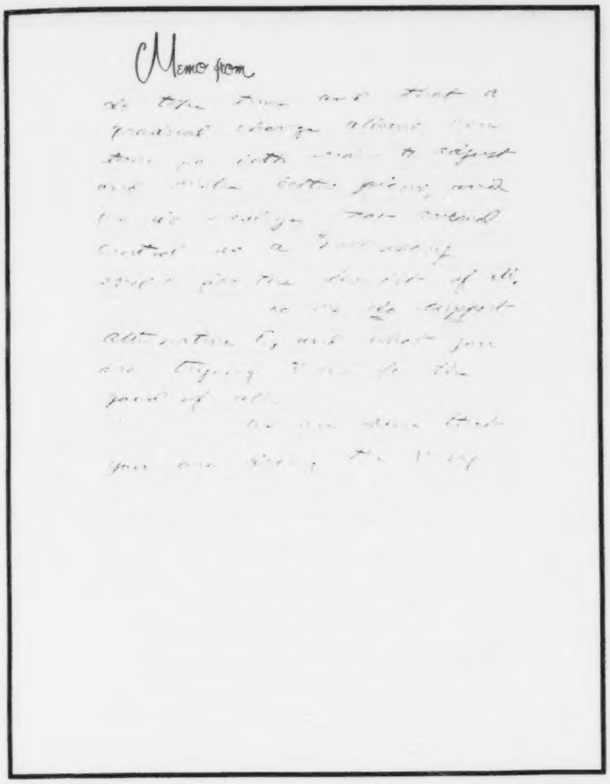
In regards to the Draft Environmental Impact statement we received today concerning the management of the Charles M. Russell National Wildlife Refuge in Montana, we agree the most with Alternative E — (No Grazing).

We realize that cattle must graze somewhere



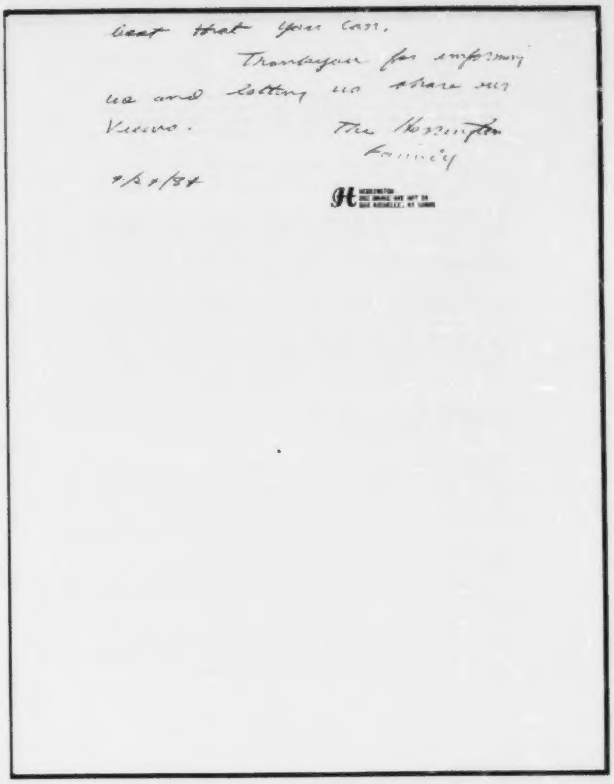
and that people should be (2) able to "get back to nature," but we think that a wildlife refuge should be for wildlife, and not cattle grazing, oil drilling, coal mining or so built up for tourists that it becomes not "impossible to see the forest for the trees," but the animals for the people!

We do realize the cattle would fatten faster and that there wouldn't be a need for animal control — But! — we do realize that these things



Memo from

is the time and that a
gradual change allows time
for you [illegible] to adjust
and make better pricing and
[illegible] change [illegible] trend
[illegible] as a [illegible]
[illegible] for the benefit of all.
So we do support
alternative C, and what you
are trying to do for the
good of all.
We are sure that
you are doing the very

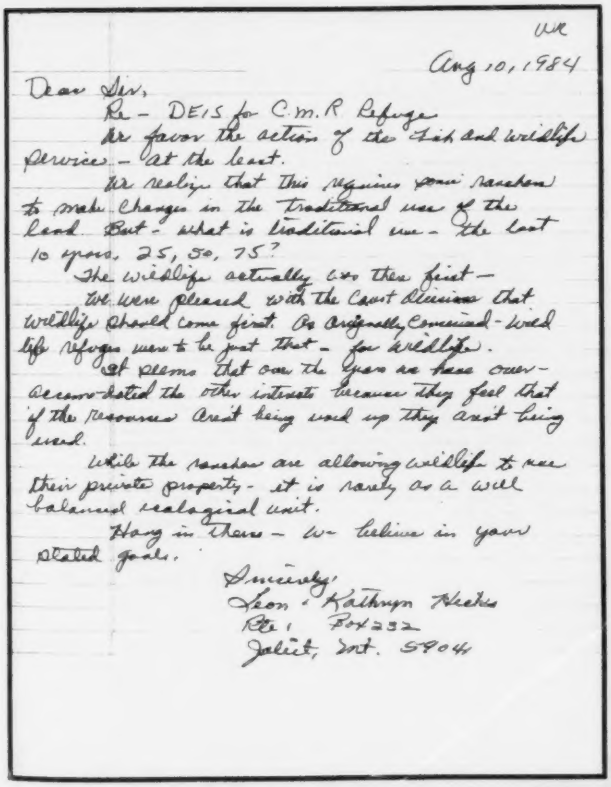


best that you can.

Thankyou for informing
us and letting us share our
views.

The Herrington
Family

9/20/84



WR

Aug 10, 1984

Dear Sir,

Re - DEIS for C.M.R Refuge

We favor the action of the Fish and Wildlife Service - at the least.

We realize that this requires some ranchers to make changes in the traditional use of the land. But - what is traditional use - the last 10 years, 25, 50, 75?

The wildlife actually was there first -

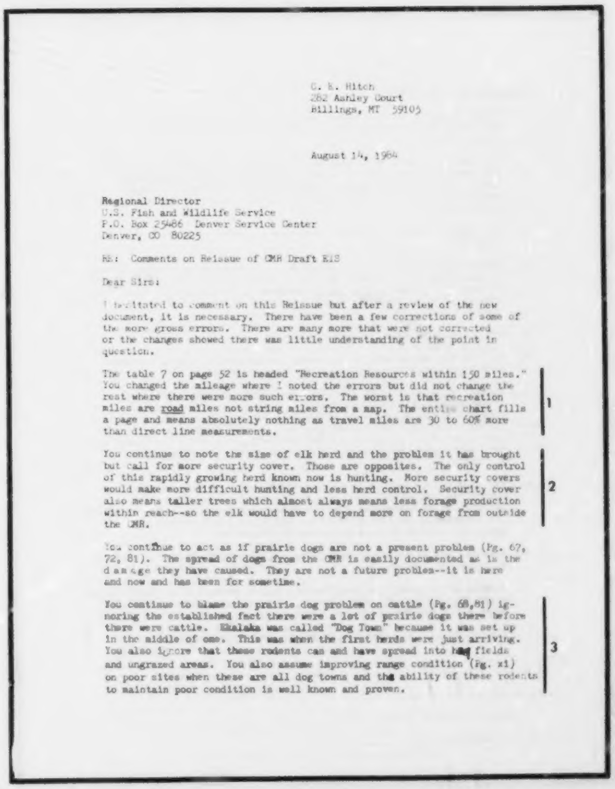
We were pleased with the Court Decisions that wildlife should come first. As originally conceived - wild life refuges were to be just that - for wildlife.

It seems that over the years we have over-accomodated the other interests because they feel that if the resources aren't being used up they aren't being used.

While the ranchers are allowing wildlife to use their private property - it is rarely as a well balanced ecological unit.

Hang in there - we believe in your stated goals.

Sincerely,
Leon & Kathryn Hicks
Rte. 1 Box 232
Joliet, Mt. 5904



C. E. Hitch
282 Ashley Court
Billings, MT 59105

August 14, 1984

Regional Director
U.S. Fish and Wildlife Service
P.O. Box 25486 Denver Service Center
Denver, CO 80225

RE: Comments on Reissue of CMR Draft EIS

Dear Sirs:

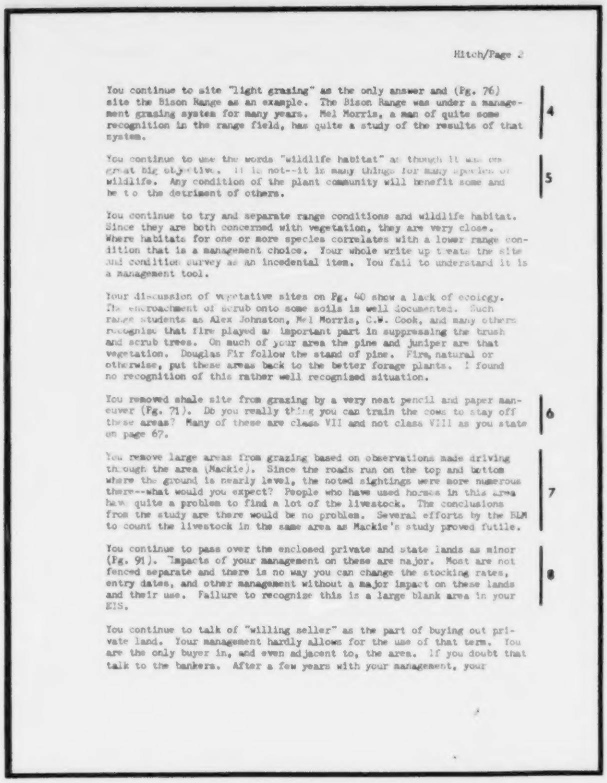
I hesitated to comment on this Reissue but after a review of the new document, it is necessary. There have been a few corrections of some of the more gross errors. There are many more that were not corrected or the changes showed there was little understanding of the point in question.

The table 7 on page 52 is headed "Recreation Resources within 150 miles." You changed the mileage where I noted the errors but did not change the rest where there were more such errors. The worst is that recreation miles are road miles not string miles from a map. The entire chart fills a page and means absolutely nothing as travel miles are 30 to 60% more than direct line measurements. 1

You continue to note the size of elk herd and the problem it has brought but call for more security cover. Those are opposites. The only control of this rapidly growing herd known now is hunting. More security covers would make more difficult hunting and less herd control. Security cover also means taller trees which almost always means less forage production within reach--so the elk would have to depend more on forage from outside the CMR. 2

You continue to act as if prairie dogs are not a present problem (Pg. 67, 72, 81). The spread of dogs from the CMR is easily documented as is the damage they have caused. They are not a future problem--it is here and now and has been for sometime.

You continue to blame the prairie dog problem on cattle (Pg. 68,81) ignoring the established fact there were a lot of prairie dogs there before there were cattle. Ekalaka was called "Dog Town" because it was set up in the middle of one. This was when the first herds were just arriving. You also ignore that these rodents can and have spread into hay fields and ungrazed areas. You also assume improving range condition (Pg. 81) on poor sites when these are all dog towns and the ability of these rodents to maintain poor condition is well known and proven. 3



You continue to site "light grazing" as the only answer and (Pg. 76) site the Bison Range as an example. The Bison Range was under a management grazing system for many years. Mel Morris, a man of quite some recognition in the range field, has quite a study of the results of that system. 4

You continue to use the words "wildlife habitat" as though it was one great big objective. It is not--it is many things for many species of wildlife. Any condition of the plant community will benefit some and be to the detriment of others. 5

You continue to try and separate range conditions and wildlife habitat. Since they are both concerned with vegetation, they are very close. Where habitats for one or more species correlates with a lower range condition that is a management choice. Your whole write up treats the site and condition survey as an incedental item. You fail to understand it is a management tool.

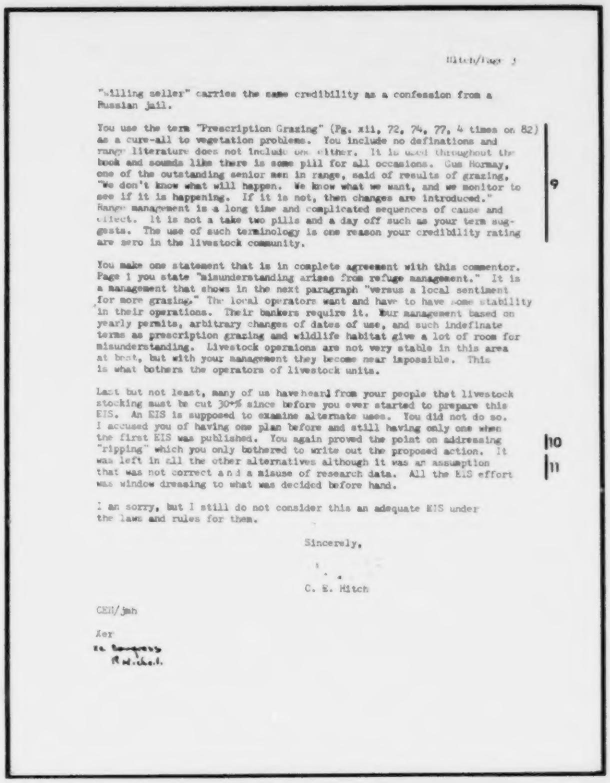
Your discussion of vegetative sites on Pg. 40 show a lack of ecology. The encroachment of scrub onto some soils is well documented. Such range students as Alex Johnston, Mel Morris, C.W. Cook, and many others recognise that fire played an important part in suppressing the brush and scrub trees. On much of your area the pine and juniper are that vegetation. Douglas Fir follow the stand of pine. Fire, natural or otherwise, put these areas back to the better forage plants. I found no recognition of this rather well recognized situation.

You removed shale site from grazing by a very neat pencil and paper maneuver (Pg. 71). Do you really thing you can train the cows to stay off these areas? Many of these are class VII and not class VIII as you state on page 67. 6

You remove large areas from grazing based on observations made driving through the area (Mackie). Since the roads run on the top and bottom where the ground is nearly level, the noted sightings were more numerous there--what would you expect? People who have used horses in this area have quite a problem to find a lot of the livestock. The conclusions from the study are there would be no problem. Several efforts by the BLM to count the livestock in the same area as Mackie's study proved futile. 7

You continue to pass over the enclosed private and state lands as minor (Pg. 91). Impacts of your management on these are major. Most are not fenced separate and there is no way you can change the stocking rates, entry dates, and other management without a major impact on these lands and their use. Failure to recognize this is a large blank area in your EIS. 8

You continue to talk of "willing seller" as the part of buying out private land. Your management hardly allows for the use of that term. You are the only buyer in, and even adjacent to, the area. If you doubt that talk to the bankers. After a few years with your management, your



"willing seller" carries the same credibility as a confession from a Russian jail.

You use the term "Prescription Grazing" (Pg. xii, 72, 74, 77, 4 times on 82) as a cure-all to vegetation problems. You include no definations and range literature does not include one either. It is used throughout the book and sounds like there is some pill for all occasions. Gus Hormay, one of the outstanding senior men in range, said of results of grazing, "We don't know what will happen. We know what we want, and we monitor to see if it is happening. If it is not, then changes are introduced." Range management is a long time and complicated sequences of cause and effect. It is not a take two pills and a day off such as your term suggests. The use of such terminology is one reason your credibility rating are zero in the livestock community. 9

You make one statement that is in complete agreement with this commentor. Page 1 you state "misunderstanding arises from refuge management." It is a management that shows in the next paragraph "versus a local sentiment for more grazing." The local operators want and have to have some stability in their operations. Their bankers require it. Your management based on yearly permits, arbitrary changes of dates of use, and such indefinate terms as prescription grazing and wildlife habitat give a lot of room for misunderstanding. Livestock operaions are not very stable in this area at best, but with your management they become near impossible. This is what bothers the operators of livestock units.

Last but not least, many of us have heard from your people that livestock stocking must be cut 30+% since before you ever started to prepare this EIS. An EIS is supposed to examine alternate uses. You did not do so. I accused you of having one plan before and still having only one when the first EIS was published. You again proved the point on addressing "ripping" which you only bothered to write out the proposed action. 10 It was left in all the other alternatives although it was an assumption that was not correct and a misuse of research data. 11 All the EIS effort was window dressing to what was decided before hand.

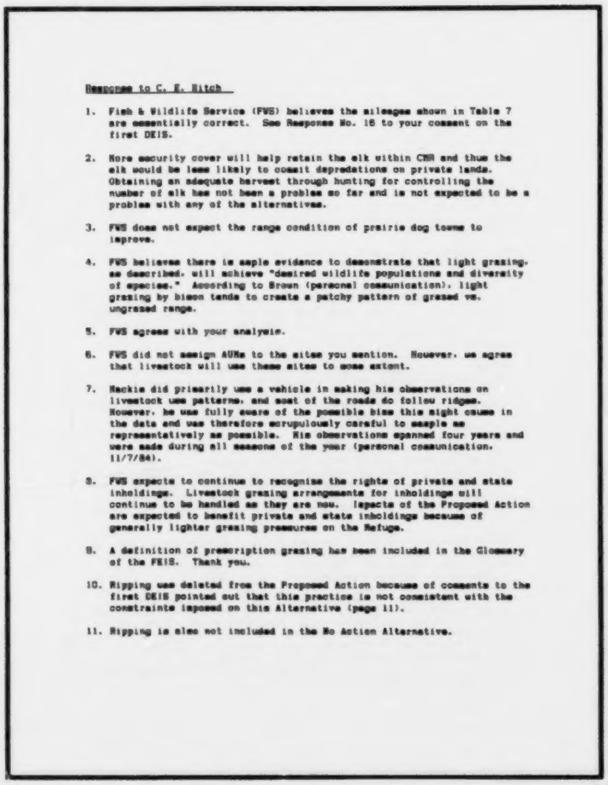
I am sorry, but I still do not consider this an adequate EIS under the laws and rules for them.

Sincerely,

C. E. Hitch

CEH/jmh

Xer



Response to C. E. Hitch

1. Fish & Wildlife Service (FWS) believes the mileages shown in Table 7 are essentially correct. See Response No. 16 to your comment on the first DEIS.

2. More security cover will help retain the elk within CMR and thus the elk would be less likely to commit depredations on private lands. Obtaining an adequate harvest through hunting for controlling the number of elk has not been a problem so far and is not expected to be a problem with any of the alternatives.

3. FWS does not expect the range condition of prairie dog towns to improve.

4. FWS believes there is ample evidence to demonstrate that light grazing, as described, will achieve "desired wildlife populations and diversity of species." According to Brown (personal communication), light grazing by bison tends to create a patchy pattern of grazed vs. ungrazed range.

5. FWS agrees with your analysis.

6. FWS did not assign AUMs to the sites you mention. However, we agree that livestock will use these sites to some extent.

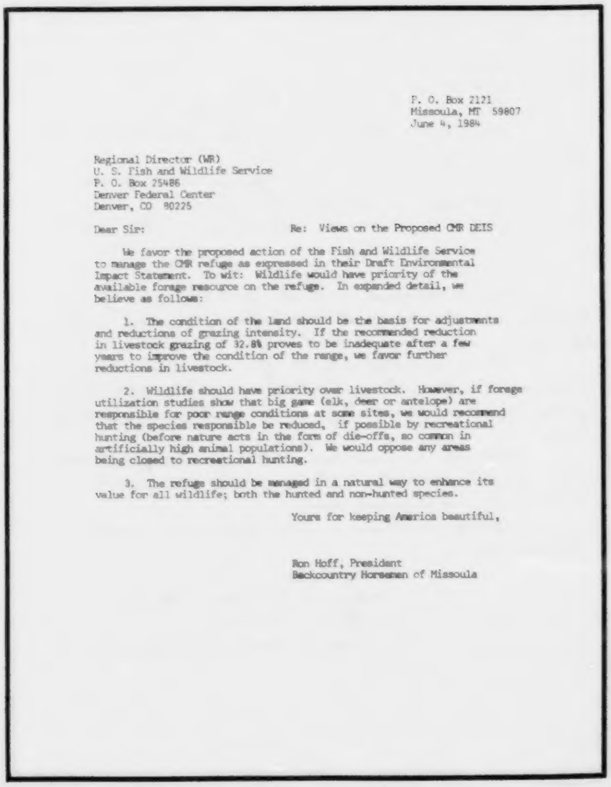
7. Mackie did primarily use a vehicle in making his observations on livestock use patterns, and most of the roads do follow ridges. However, he was fully aware of the possible bias this might cause in the data and was therefore scrupulously careful to sample as representatively as possible. His observations spanned four years and were made during all seasons of the year (personal communication, 11/7/84).

8. FWS expects to continue to recognize the rights of private and state inholdings. Livestock grazing arrangements for inholdings will continue to be handled as they are now. Impacts of the Proposed Action are expected to benefit private and state inholdings because of generally lighter grazing pressures on the Refuge.

9. A definition of prescription grazing has been included in the Glossary of the FEIS. Thank you.

10. Ripping was deleted from the Proposed Action because of comments to the first DEIS pointed out that this practice is not consistent with the constraints imposed on this Alternative (page 11).

11. Ripping is also not included in the No Action Alternative.



P. O. Box 2121
Missoula, MT 59807
June 4, 1984

Regional Director (WR)
U. S. Fish and Wildlife Service
P. O. Box 25486
Denver Federal Center
Denver, CO 80225

Dear Sir:

Re: Views on the Proposed CMR DEIS

We favor the proposed action of the Fish and Wildlife Service to manage the CMR refuge as expressed in their Draft Environmental Impact Statement. To wit: Wildlife would have priority of the available forage resource on the refuge. In expanded detail, we believe as follows:

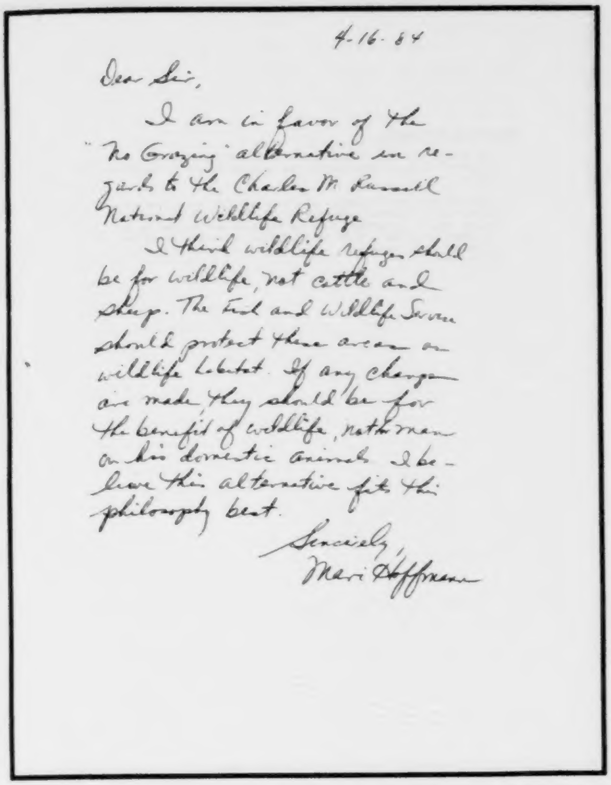
1. The condition of the land should be the basis for adjustments and reductions of grazing intensity. If the recommended reduction in livestock grazing of 32.8% proves to be inadequate after a few years to improve the condition of the range, we favor further reductions in livestock.

2. Wildlife should have priority over livestock. However, if forage utilization studies show that big game (elk, deer or antelope) are responsible for poor range conditions at some sites, we would recommend that the species responsible be reduced, if possible by recreational hunting (before nature acts in the form of die-offs, so common in artificially high animal populations). We would oppose any areas being closed to recreational hunting.

3. The refuge should be managed in a natural way to enhance its value for all wildlife; both the hunted and non-hunted species.

Yours for keeping America beautiful,

Ron Hoff, President
Backcountry Horsemen of Missoula



4-16-84

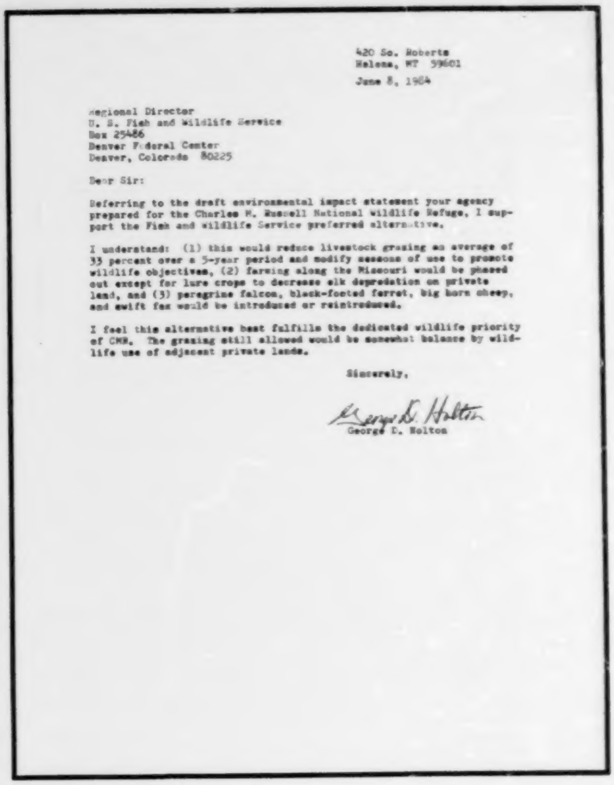
Dear Sir,

I am in favor of the "No Grazing" alternative in regards to the Charles M. Russell National Wildlife Refuge

I think wildlife refuges should be for wildlife, not cattle and sheep. The Fish and Wildlife Service should protect these areas as wildlife habitat. If any changes are made they should be for the benefit of wildlife, not the man or his domestic animals. I believe this alternative fits this philosophy best.

Sincerely,

Mari Hoffmann



420 So. Roberts
Helena, MT 59601

June 8, 1984

Regional Director
U. S. Fish and Wildlife Service
Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Sir:

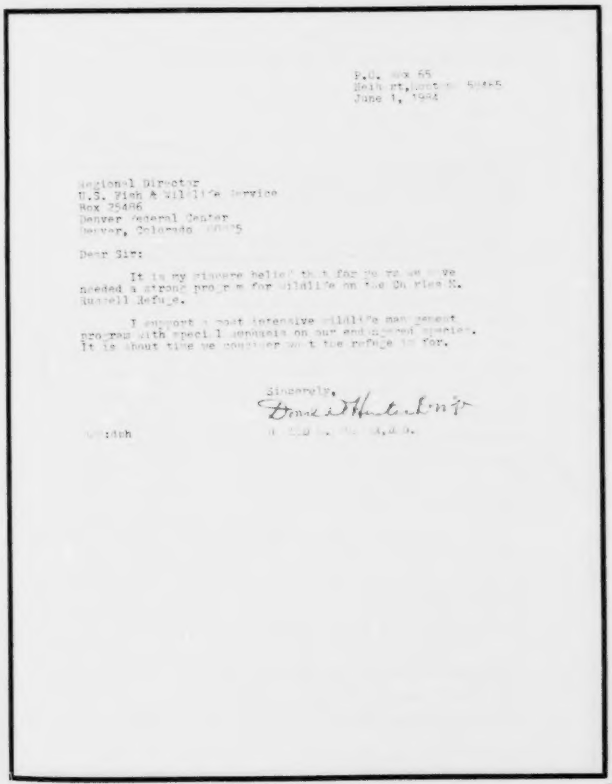
Referring to the draft environmental impact statement your agency prepared for the Charles M. Russell National Wildlife Refuge, I support the Fish and Wildlife Service preferred alternative.

I understand: (1) this would reduce livestock grazing an average of 33 percent over a 5-year period and modify seasons of use to promote wildlife objectives, (2) farming along the Missouri would be phased out except for lure crops to decrease elk depredation on private land, and (3) peregrine falcon, black-footed ferret, big horn sheep, and swift fox would be introduced or reintroduced.

I feel this alternative best fulfills the dedicated wildlife priority of CMR. The grazing still allowed would be somewhat balance by wildlife use of adjacent private lands.

Sincerely,

George D. Holton
George D. Holton



P.O. Box 65
Neihart, Montana 59465
June 1, 1984

Regional Director
U.S. Fish & Wildlife Service
Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Sir:

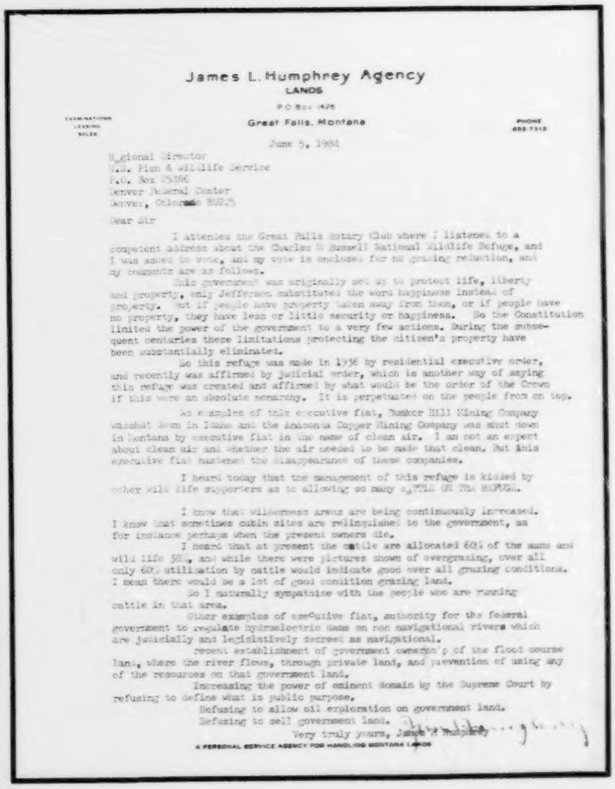
It is my sincere belief that for years we have needed a strong program for wildlife on the Charles M. Russell Refuge.

I support a most intensive wildlife management program with special emphasis on our endangered species. It is about time we consider what the refuge is for.

Sincerely,

[illegible], M.D.

[illegible]:dch



James L. Humphrey Agency
LANDS
P O Box 1426
Great Falls, Montana

EXAMINATIONS
LEASING
SALES

PHONE
452-7312

June 5, 1984

Regional Director
U.S. Fish & Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Sir

I attended the Great Falls Rotary Club where I listened to a competent address about the Charles M Russell National Wildlife Refuge, and I was asked to vote, and my vote is enclosed for no grazing reduction, and my comments are as follows.

This government was originally set up to protect life, liberty and property, only Jefferson substituted the word happiness instead of property. But if people have property taken away from them, or if people have no property, they have less or little security or happiness. So the Constitution limited the power of the government to a very few actions. During the subsequent centuries these limitations protecting the citizen's property have been substantially eliminated.

So this refuge was made in 1936 by residential executive order, and recently was affirmed by judicial order, which is another way of saying this refuge was created and affirmed by what would be the order of the Crown if this were an absolute monarchy. It is perpetuated on the people from on top.

As examples of this executive fiat, Bunker Hill Mining Company wasshut down in Idaho and the Anaconda Copper Mining Company was shut down in Montana by executive fiat in the name of clean air. I am not an expert about clean air and whether the air needed to be made that clean. But this executive fiat hastened the disappearance of these companies.

I heard today that the management of this refuge is kidded by other wild life supporters as to allowing so many CATTLE ON THE REFUGE.

I know that wilderness areas are being continuously increased. I know that sometimes cabin sites are relinquished to the government, as for instance perhaps when the present owners die.

I heard that at present the cattle are allocated 60% of the aums and wild life 38%, and while there were pictures shown of overgrazing, over all only 60% utilization by cattle would indicate good over all grazing conditions. I mean there would be a lot of good condition grazing land.

So I naturally sympatnize with the people who are running cattle in that area.

Other examples of executive fiat, authority for the federal government to regulate hydroelectric dams on non navigational rivers which are judicially and legislatively decreed as navigational.

recent establishment of government ownership of the flood course land, where the river flows, through private land, and prevention of using any of the resources on that government land.

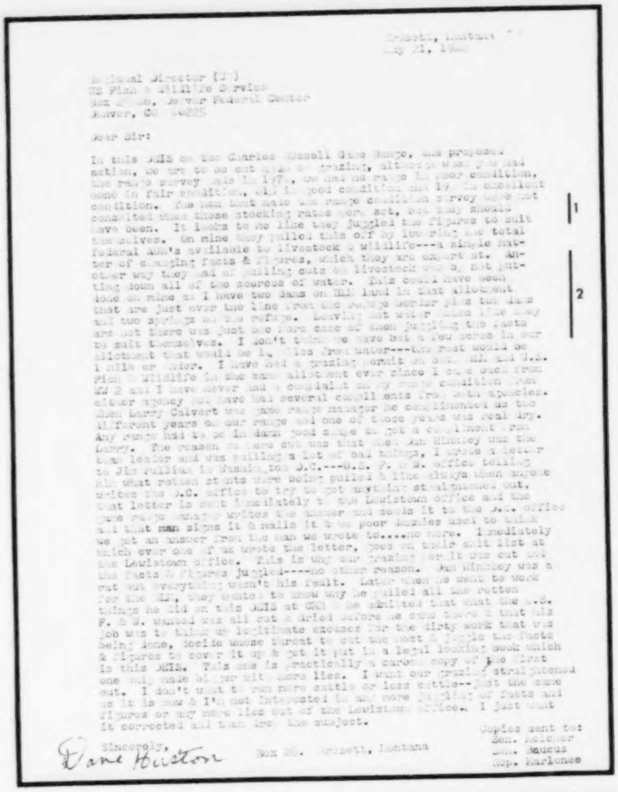
Increasing the power of eminent domain by the Supreme Court by refusing to define what is public purpose.

Refusing to allow oil exploration on government land.

Refusing to sell government land.

Very truly yours, James L Humphrey

A PERSONAL SERVICE AGENCY FOR HANDLING MONTANA LANDS



Brusett, Montana [illegible]
May 21, 19[illegible]

Regional Director (EX)
US Fish & Wildlife Service
Box 25486, Denver Federal Center
Denver, CO 80225

Dear Sir:

In this DEIS on the Charles Russell Game Range, the proposed
action, we are to be cut [illegible] on grazing, although when you had
the range survey made in 197[illegible], we had no range in poor condition,
none in fair condition, [illegible] in good condition and [illegible] in excellent
condition. The men that made the range condition survey were not
consulted when these stocking rates were set, but they should 1
have been. It looks to me like they juggled the figures to suit
themselves. On mine they pulled this off by lowering the total
federal AUM's available to livestock & wildlife---a simple mat-
ter of changing facts & figures, which they are expert at. An-
other way they had of pulling cuts on livestock was by not put-
ting down all of the sources of water. This could have been
done on mine as I have two dams on BLM land in that allotment 2
that are just over the line from the refuge border plus two dams
and two springs on the refuge. Leaving out water holes like they
are not there was just one more case of them juggling the facts
to suit themselves. I don't think we have but a few acres in our
allotment that would be 1½ miles from water---the rest would be
1 mile or under. I have had a grazing permit on both BLM and U.S.
Fish & Wildlife in the same allotment ever since I came back from
WW 2 and I have never had a complaint on my range condition from
either agency but have had several compliments from both agencies.
When Larry Calvert was game range manager he complimented us two
different years on our range and one of those years was real dry.
Any range had to be in damn good shape to get a compliment from
Larry. The reason we were cut was that when Dan Hinkley was the
team leader and was pulling a lot of bad things, I wrote a letter
to Jim Pulliam in Washington D.C.---U.S. F. & W. office telling
him what rotten stunts were being pulled & like always when anyone
writes the D.C. office to try to get anything straightened out,
that letter is sent immediately to the Lewistown office and the
game range manager writes the answer and sends it to the D.C. office
and that man signs it & mails it & we poor dummies used to think
we got an answer from the man we wrote to....no more. Immediately
which ever one of us wrote the letter, goes on their shit list at
the Lewistown office. This is why our grazing permit was cut and
the facts & figures juggled----no other reason. Dan Hinkley was a
rat but everything wasn't his fault. Later when he went to work
for the BLM, they wanted to know why he pulled all the rotten
things he did on this DEIS at CMR & he admitted that what the U.S.
F. & W. wanted was all cut & dried before he came there & that his
job was to think up legitimate excuses for the dirty work that was
being done, decide whose throat to cut the most & juggle the facts
& figures to cover it up & get it put in a legal looking book which
is this DEIS. This one is practically a carbon copy of the first
one only made bigger with more lies. I want our grazing straightened
out. I don't want to run more cattle or less cattle--just the same
as it is now & I'm not interested in any more juggling of facts and
figures or any more lies out of the Lewistown office. I just want
it corrected and then drop the subject.

Sincerely,
Dave Huston

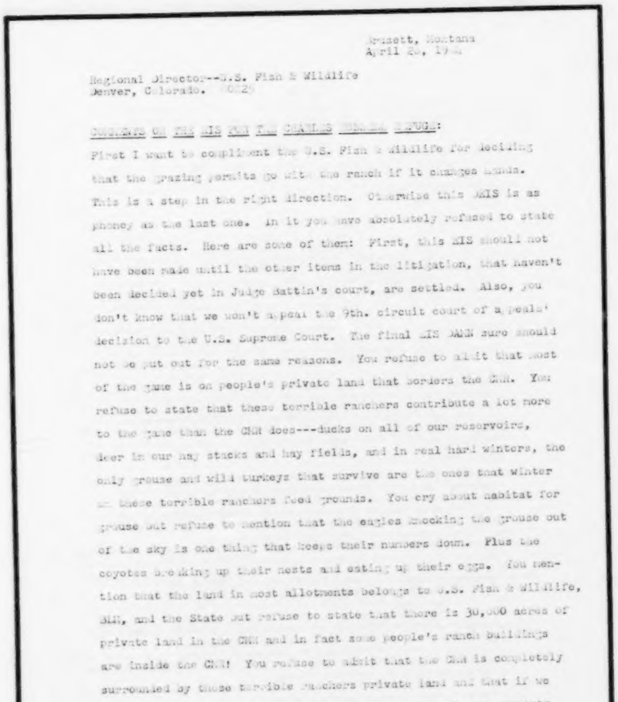
Box 20, Brusett, Montana

Copies sent to:
Sen. Melcher
Sen. Baucus
Rep. Marlenee

Response to Dave Huston

1. The methodology used in determining total AUM's available to both livestock and wildlife are explained in great detail in Appendices 7, 8 and 15.

2. Water sources used to compute allotment carrying capacities were determined by personal knowledge of the local FWS Range Biologist, aerial photos, topographic maps, and information provided by the allotment permittee. Every CMR permittee was sent a map of his allotment with the request to identify all water sources on his allotment.

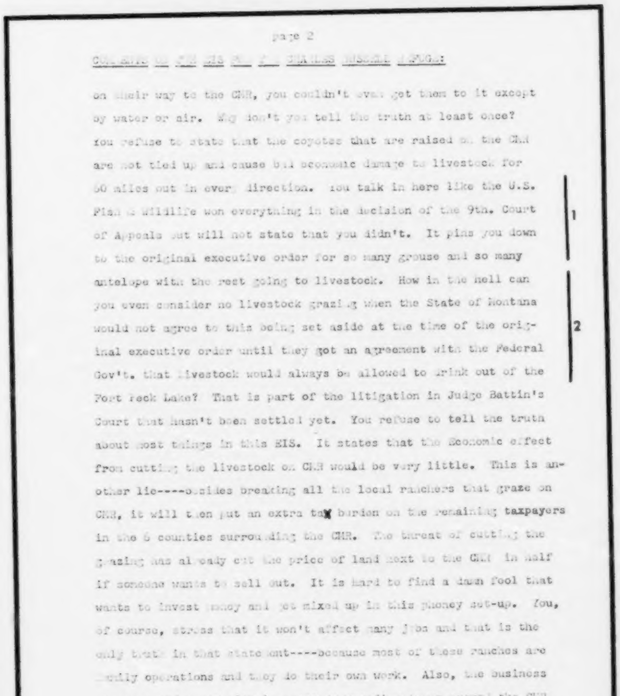


Brusett, Montana
April 28, 19[illegible]

Regional Director--U.S. Fish & Wildlife
Denver, Colorado. 80225

COMMENTS ON THE EIS FOR THE CHARLES RUSSELL REFUGE:

First I want to compliment the U.S. Fish & Wildlife for deciding
that the grazing permits go with the ranch if it changes hands.
This is a step in the right direction. Otherwise this DEIS is as
phoney as the last one. In it you have absolutely refused to state
all the facts. Here are some of them: First, this EIS should not
have been made until the other items in the litigation, that haven't
been decided yet in Judge Battin's court, are settled. Also, you
don't know that we won't appeal the 9th. circuit court of appeals'
decision to the U.S. Supreme Court. The final EIS DAMN sure should
not be put out for the same reasons. You refuse to admit that most
of the game is on people's private land that borders the CMR. You
refuse to state that these terrible ranchers contribute a lot more
to the game than the CMR does---ducks on all of our reservoirs,
deer in our hay stacks and hay fields, and in real hard winters, the
only grouse and wild turkeys that survive are the ones that winter
on these terrible ranchers feed grounds. You cry about habitat for
grouse but refuse to mention that the eagles knocking the grouse out
of the sky is one thing that keeps their numbers down. Plus the
coyotes breaking up their nests and eating up their eggs. You men-
tion that the land in most allotments belongs to U.S. Fish & Wildlife,
BLM, and the State but refuse to state that there is 30,000 acres of
private land in the CMR and in fact some people's ranch buildings
are inside the CMR! You refuse to admit that the CMR is completely
surrounded by these terrible ranchers private land and that if we
weren't kind enough so far, to let people go through our property



page 2

COMMENTS ON THE EIS FOR THE CHARLES RUSSELL REFUGE:

on their way to the CMR, you couldn't even get them to it except
by water or air. Why don't you tell the truth at least once?
You refuse to state that the coyotes that are raised on the CMR
are not tied up and cause bad economic damage to livestock for
60 miles out in every direction. You talk in here like the U.S.
Fish & Wildlife won everything in the decision of the 9th. Court 1
of Appeals but will not state that you didn't. It pins you down
to the original executive order for so many grouse and so many
antelope with the rest going to livestock. How in the hell can
you even consider no livestock grazing when the State of Montana
would not agree to this being set aside at the time of the orig- 2
inal executive order until they got an agreement with the Federal
Gov't. that livestock would always be allowed to drink out of the
Fort Peck Lake? That is part of the litigation in Judge Battin's
Court that hasn't been settled yet. You refuse to tell the truth
about most things in this EIS. It states that the Economic effect
from cutting the livestock on CMR would be very little. This is an-
other lie----besides breaking all the local ranchers that graze on
CMR, it will then put an extra tax burden on the remaining taxpayers
in the 6 counties surrounding the CMR. The threat of cutting the
grazing has already cut the price of land next to the CMR in half
if someone wants to sell out. It is hard to find a damn fool that
wants to invest money and get mixed up in this phoney set-up. You,
of course, stress that it won't affect many jobs and that is the
only truth in that statement----because most of these ranches are
family operations and they do their own work. Also, the business
men we spend money with in these surrounding towns around the CMR
are family businesses and they do most of their own work. You say

page 3

COMMENTS ON THE EIS FOR THE CHARLES RUSSELL REFUGE:

that range conditions have nothing to do with the habitat. This is another lie and is just another gimic to get the livestock off the range. You say that the ranchers that graze in CMR only depend on CMR for 13% of grass. This is hardly even a half-truth. A few do, but a lot of people depend 50% on CMR grass and some of them depend on it for more than that. You say you want to cut the livestock on drouth years as if drouths are caused by ranchers. There were drouths here before there were ranchers and there will be more after you have starved us all out. You state that the Communist groups that you call environmental groups want less grazing or none---that the local people want more grazing. That is another half-truth. The Communist groups want less or none alright but I don't know any local people that want more grazing. Everyone wants it to stay just as it is now. No more---no less. You brag about how much more money you got out of the U.S. Fish & Wildlife raising the grazing fees out of sight but failed to mention all the money that has been wasted on the CMR by the management, chartered aircraft tours hauling writers from the Communist groups around while the refuge manager fills them full of lies. Except for a few fence posts the U.S. Fish & Wildlife has furnished for us dummies to set, every dollar that has been spent on the CMR has been wasted. No matter what subject is mentioned in this EIS, whether it mentions livestock or not, it boils down to one thing---CUT THE LIVESTOCK PEOPLE'S THROAT! The word "conflict" has been used several times in this EIS but of course it doesn't mention that the "conflict" has all been created by the U.S. Fish & Wildlife. There would have been a lot less conflict if you could have had a refuge manager on CMR that wasn't so dumb that he didn't know resources from intercourse and if he could have got it through his thick head that he

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page 4

COMMENTS ON THE EIS FOR THE CHARLES RUSSELL REFUGE:

had to get along with decent people instead of just the Communist groups. It looks like the only endangered species around the CMR is the local people. In looking through the last DEIS it looks as though the U.S. Fish & Wildlife must have contacted every Communist group and individual in the U.S. for comment and it would probably be safe to bet all of our blue chips that the same has been done this time. It's not surprising as the people in Eastern Montana have learned from experience the last few yrs. that nothing is too underhanded for the U.S. Fish & Wildlife to do. Alternative A---the "no action", with absolutely no cuts in livestock, is the only one that shows any common sense and that is the one I recommend. And with no mitigating measures.

Dave Huston
Dave Huston
Box 28. Brusett, Montana. 59318

COPIES SENT TO THE FOLLOWING:

REPRESENTATIVE RON MARLENEE
SENATOR JOHN MELCHER
SENATOR MAX BAUCUS
SECRETARY OF INTERIOR, WILLIAM P. CLARK
RAY ARNETT

Nothing has been settled between the BLM &
the USF&W on these allotments yet & probably
won't be as long as the USF&W on the CMR
remain as unreasonable & untruthfull as they
are at the present Time.

Response to Dave Huston

1. The Ninth Circuit Court of Appeals did rule in favor of Executive Order 7509, which provides for 400,000 sharp-tailed grouse and 1500 antelope, "the primary species, and such nonpredatory secondary species in such numbers as may be necessary to maintain a balanced wildlife population- - -".

2. As with the Multiple Use alternative, the No Grazing alternative would require changes in basic authorizations if it were to be implemented. These alternatives were included in the EIS because of the large number of people interested in them.

Jordan, Montana Box 173
August 9, 1984

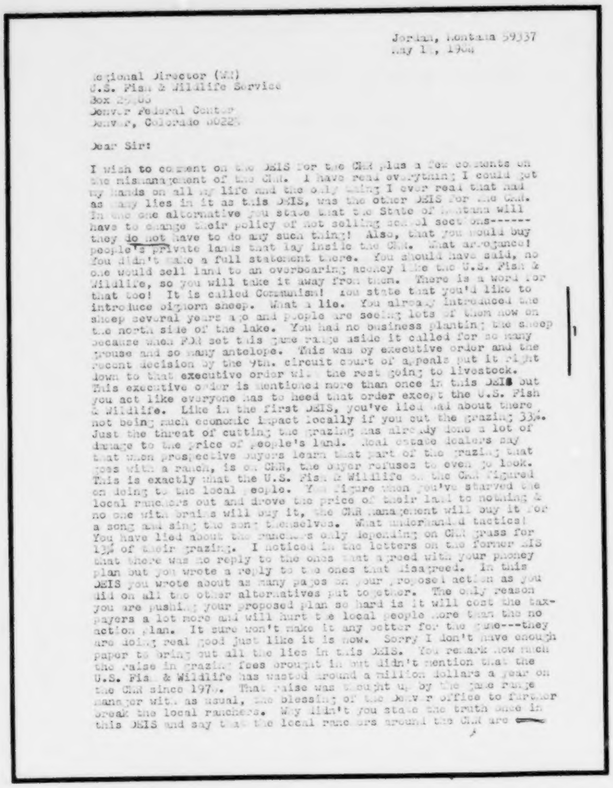
Director U.S. Fish & Wildlife
Denver, Colorado 80225

MY COMMENTS ON THE DEIS FOR CHARLES RUSSELL GAME REFUGE

First, I am not a rancher but I do know most of the ranchers on both sides of the Fort Peck Lake and I have found them to be honest and truthful. Most people have not found the management of the CMR to be one bit truthful and also no one including me, can find hardly any truth in this blue book---the DEIS. Their statement that the 33% cut in livestock will have very little economic effect on the local economy isn't even close to the truth. It will have a devastating effect on business and on the local tax base. The statement on how many people are now visiting the CMR is away higher than it actually is by at least double and when they state how many will be visiting CMR by year such and such is to say the least, a stupid statement besides being a lie. There may be more, there may be less or there may be none. The economy and the price of gasoline will have a lot more bearing on how many visitors rather than a dumb statement by your stupid refuge manager. I don't go on the CMR except on week ends but I see a lot when I do go. Mostly the mismanagement of preditors and game by the refuge manager. I counted 42 deer kills on the ice in about 2½ miles once last winter. Many other people saw about the same and some saw larger kills in different places. It looks in this blue book like their mismanagement is being camouflaged by saying they don't care about numbers----only habitat. I am not a cabin owner either but those peoples cabins are not hurting anything or anybody. Leave them alone. The U.S. Fish and Wildlife has just a few good men with common sense but they are at the bottom of the heap at CMR and will be kept there. It appears there is no place for men with common sense higher up in the U.S. Fish and Wildlife. We would have a lot more sharp tail grouse on the CMR if they would build more dams for water holes as grouse won't nest more than ½ mile from water but the management has refused to build more water holes for birds and game because he doesn't want the ranchers cattle getting to drink any of the water. The range is in good condition except it needs more water. No cuts are necessary in the men's livestock except to work off some of the refuge managers hate toward these ranchers. Trapping is supposed to be allowed on the CMR this coming winter but the refuge manager is going to put so many restrictions on, that very few coyotes will be caught and that's what he and the Communist groups that are backing him, want. I recommend either alternative A-the no action or multiple use action D and no mitigating measures out of the other alternatives. The livestock and game have never interferred with one another and never will.

Thank You,

Sam Huston — Sam Huston
Box 173
Jordan, MT. 59337



Jordan, Montana 59337
May 1[illegible], 1984

Regional Director (WR)
U.S. Fish & Wildlife Service
Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Sir:

I wish to comment on the DEIS for the CMR plus a few comments on the mismanagement of the CMR. I have read everything I could get my hands on all my life and the only thing I ever read that had as many lies in it as this DEIS, was the other DEIS for the CMR. In the one alternative you state that the State of Montana will have to change their policy of not selling school sections------they do not have to do any such thing! Also, that you would buy people's private lands that lay inside the CMR. What arrogance! You didn't make a full statement there. You should have said, no one would sell land to an overbearing agency like the U.S. Fish & Wildlife, so you will take it away from them. There is a word for that too! It is called Communism! You state that you'd like to introduce bighorn sheep. What a lie. You already introduced the sheep several years ago and people are seeing lots of them now on the north side of the lake. You had no business planting the sheep 1 because when FDR set this game range aside it called for so many grouse and so many antelope. This was by executive order and the recent decision by the 9th. circuit court of appeals put it right down to that executive order with the rest going to livestock. This executive order is mentioned more than once in this DEIS but you act like everyone has to heed that order except the U.S. Fish & Wildlife. Like in the first DEIS, you've lied and about there not being much economic impact locally if you cut the grazing 33%. Just the threat of cutting the grazing has already done a lot of damage to the price of people's land. Real estate dealers say that when prospective buyers learn that part of the grazing that goes with a ranch, is on CMR, the buyer refuses to even go look. This is exactly what the U.S. Fish & Wildlife on the CMR figured on doing to the local people. You figure when you've starved the local ranchers out and drove the price of their land to nothing & no one with brains will buy it, the CMR management will buy it for a song and sing the song themselves. What underhanded tactics! You have lied about the ranchers only depending on CMR grass for 13% of their grazing. I noticed in the letters on the former EIS that there was no reply to the ones that agreed with your phoney plan but you wrote a reply to the ones that disagreed. In this DEIS you wrote about as many pages on your proposed action as you did on all the other alternatives put together. The only reason you are pushing your proposed plan so hard is it will cost the taxpayers a lot more and will hurt the local people more than the no action plan. It sure won't make it any better for the game---they are doing real good just like it is now. Sorry I don't have enough paper to bring out all the lies in this DEIS. You remark how much the raise in grazing fees brought in but didn't mention that the U.S. Fish & Wildlife has wasted around a million dollars a year on the CMR since 1976. That raise was thought up by the game range manager with as usual, the blessing of the Denver office to further break the local ranchers. Why didn't you state the truth once in this DEIS and say that the local ranchers around the CMR are

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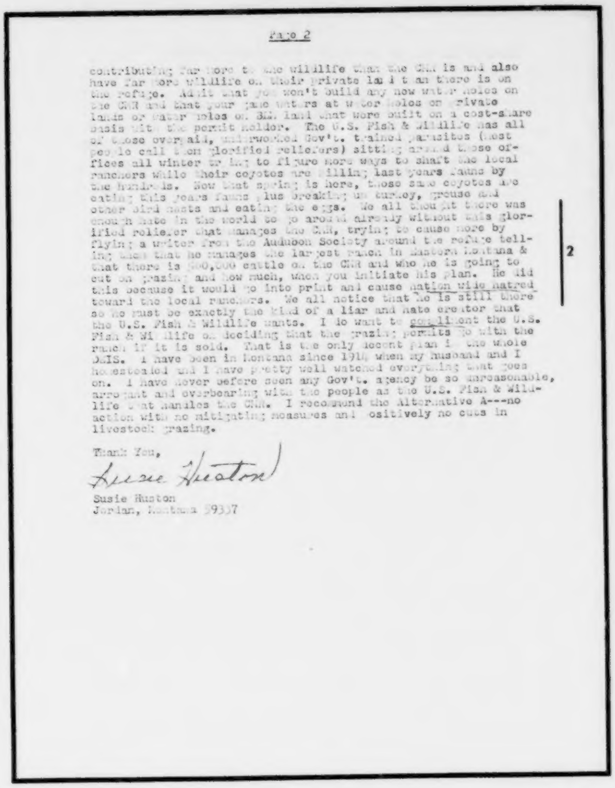


Page 2

contributing far more to the wildlife than the CMR is and also have far more wildlife on their private land than there is on the refuge. Admit that you won't build any new water holes on the CMR and that your game waters at water holes on private lands or water holes on BLM land that were built on a cost-share basis with the permit holder. The U.S. Fish & Wildlife has all of those overpaid, underworked Gov't. trained parasites (most people call them glorified reliefers) sitting around those offices all winter trying to figure more ways to shaft the local ranchers while their coyotes are killing last years fawns by the hundreds. Now that spring is here, those same coyotes are eating this years fawns plus breaking up turkey, grouse and other bird nests and eating the eggs. We all thought there was enough hate in the world to go around already without this glorified reliefer that manages the CMR, trying to cause more by flying a writer from the Audubon Society around the refuge telling them that he manages the largest ranch in Eastern Montana & that there is 500,000 cattle on the CMR and who he is going to cut on grazing and how much, when you initiate his plan. He did this because it would go into print and cause nation wide hatred toward the local ranchers. We all notice that he is still there so he must be exactly the kind of a liar and hate creator that the U.S. Fish & Wildlife wants. 2 I do want to compliment the U.S. Fish & Wildlife on deciding that the grazing permits go with the ranch if it is sold. That is the only decent plan in the whole DEIS. I have been in Montana since 1914 when my husband and I homesteaded and I have pretty well watched everything that goes on. I have never before seen any Gov't. agency be so unreasonable, arrogant and overbearing with the people as the U.S. Fish & Wildlife that handles the CMR. I recommend the Alternative A---no action with no mitigating measures and positively no cuts in livestock grazing.

Thank You,

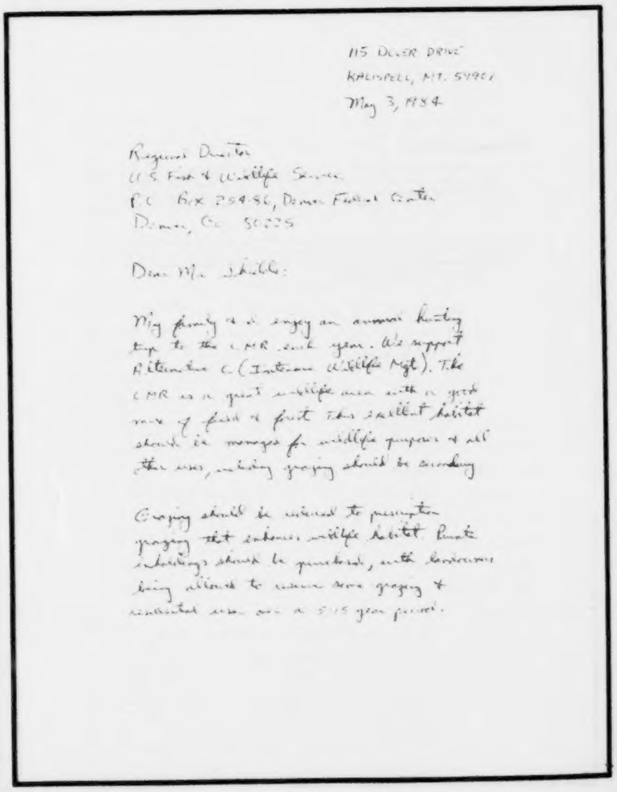
Susie Huston

Susie Huston
Jordan, Montana 59337

Response to Susie Huston

1. In cooperation with the Montana Department of Fish, Wildlife and Parks, Fish & Wildlife Service (FWS) transplanted 27 bighorn sheep on to the northside of CMR in 1980. Since bighorn sheep were native to this part of Montana, FWS considers the species as part of maintaining a "balanced wildlife population," as called for in the Executive Order and by the 9th Circuit Court of Appeals.

2. The FWS regrets the error published in the Audubon Magazine. The opportunity to edit the article was not extended by Audubon Magazine, and FWS has no control over what a private organization publishes.



115 Dover Drive
Kalispell, MT. 59901
May 3, 1984

Regional Director
U.S. Fish & Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, CO 80225

Dear Mr. Shields:

My family & I enjoy an annual hunting trip to the CMR each year. We support Alternative C (Intensive Wildlife Mgt). The CMR is a great wildlife area with a good mix of field & forest. This excellent habitat should be managed for wildlife purposes & all other uses, including grazing should be secondary.

Grazing should be reduced to prescription grazing that enhances wildlife habitat. Private inholdings should be purchased, with landowners being allowed to retain some grazing & residential use over a 5-15 year period.

2

Ranchers should not be [illegible] [illegible] from their homes without a reasonable period to adjust.

Wildlife management emphasis should be directed to deer, elk & upland birds. Restoring bighorn sheep is important. Having a chance to hunt bighorn would be a tremendous asset to Montana hunting. I support the use of prescribed fire to improve habitat & encourage you to plant riparian areas with hardwoods for big game security & winter cover.

No wilderness is needed. Make the area reasonably accessible to the general public. Reintroduction of the peregrine falcon & ferret is low priority to me.

Please add my name to your mailing list.

Sincerely yours,
Warren A. Illi
WARREN A. ILLI

FISH & WILDLIFE
MANAGEMENT & RESEARCH
DEPARTMENT OF BIOLOGY
MONTANA STATE UNIVERSITY
BOZEMAN, MONTANA 59717

9 May 1984

Regional Director
U.S. Fish and Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, CO 80225

Dear Sir:

After reading the EIS on the C. M. Russell Wildlife Refuge, I can support the proposed course of action (Alternative B). The reduction in AUM's reserved for livestock would have a minimal economic impact in the region and many benefits to wildlife would accrue. My preference would be for a modification of the intensive wildlife management option (Alternative C), but, given the regional dependence on ranching and the potential for closing surrounding private lands to hunting in protest to AUM reductions (which may happen even with Alternative B), your proposed course of action is a palatable compromise.

My primary reservation involves the tacit admission that commercial livestock grazing is a "right" on a wildlife refuge. I think that livestock grazing can be used as an effective wildlife management tool, and I am aware of the language in the order establishing the CMR, but commercial interests too often tend to wind up as the "tail wagging the dog" on areas set aside primarily for maintenance of non-commercial resource values. 1

Sincerely,
Lynn R. Irby
Lynn R. Irby
Assoc. Prof. Wildl. Manage.

TELEPHONE (406) 994-4548

Response to Lynn Irby

1. Commercial livestock grazing on CMR, as on all refuges in the National Wildlife Refuge System, is a privilege, not a right.

Regional Director
US Fish & Wildlife Service
Box 25486
Denver Co 80225

Tex Janecek
4928 Indian Ridge Rd
Billings Mt 59101

Dear Sir

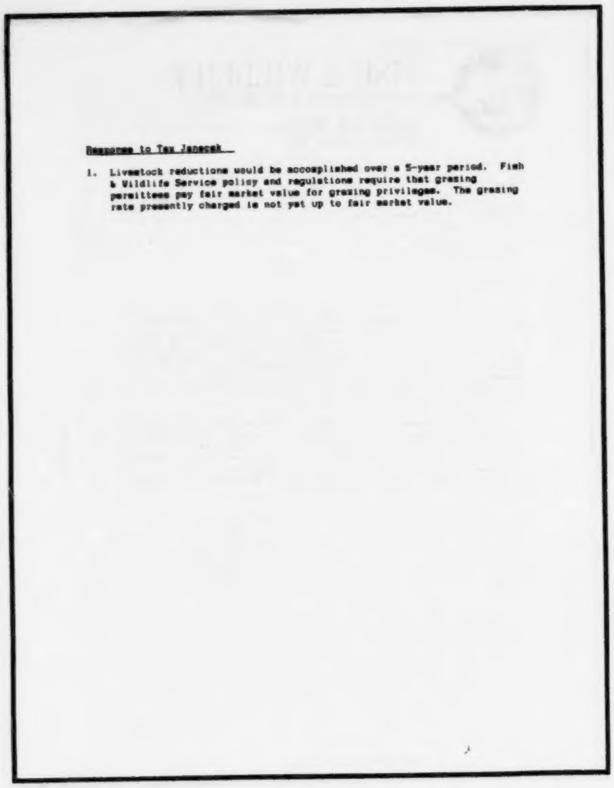
I am writing to you in regard to the game management plan on the CM Russell national wildlife Refuge.

I understand an environmental impact statement has been completed and recommends an increase of allocated forage to wildlife by 33%.

Although I believe the majority of people would favor this plan in order not to rock the boat too much in regard to ranchers. I think we need to look longer term at this issue.

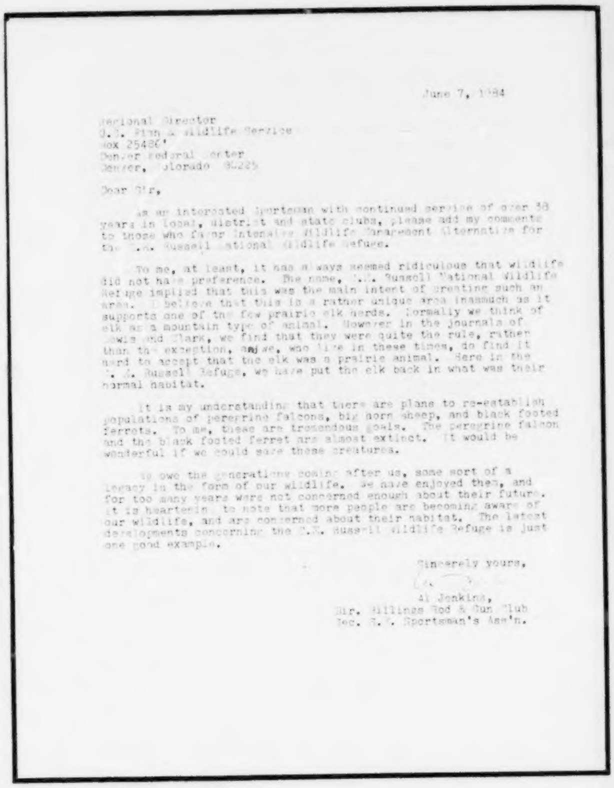
I would encourage the intensive wildlife management alternative. I would think the sensible thing would be a gradual reduction over the next 5 to 10 years in order to achieve the 50% level of reduction or greater. This should probably be reviewed on a 5 yr basis. Also lets freeze or reduce the livestock fees to ranchers. 1

sincerely
Tex Janecek



Response to Tex Janecek

1. Livestock reductions would be accomplished over a 5-year period. Fish & Wildlife Service policy and regulations require that grazing permittees pay fair market value for grazing privileges. The grazing rate presently charged is not yet up to fair market value.



June 7, 1984

Regional Director
U.S. Fish & Wildlife Service
Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Sir,

As an interested Sportsman with continued service of over 30 years in local, district and state clubs, please add my comments to those who favor Intensive Wildlife Management Alternative for the C.M. Russell National Wildlife Refuge.

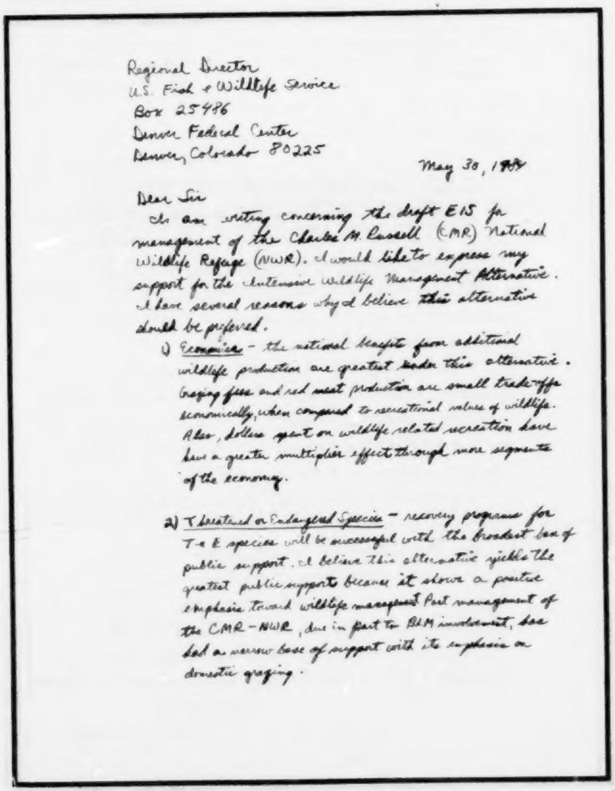
To me, at least, it has always seemed ridiculous that wildlife did not have preference. The name, C.M. Russell National Wildlife Refuge implied that this was the main intent of creating such an area. I believe that this is a rather unique area inasmuch as it supports one of the few prairie elk herds. Normally we think of elk as a mountain type of animal. However in the journals of Lewis and Clark, we find that they were quite the rule, rather than the exception, and we, who live in these times, do find it hard to accept that the elk was a prairie animal. Here in the C. M. Russell Refuge, we have put the elk back in what was their normal habitat.

It is my understanding that there are plans to re-establish populations of peregrine falcons, big horn sheep, and black footed ferrets. To me, these are tremendous goals. The peregrine falcon and the black footed ferret are almost extinct. It would be wonderful if we could save these creatures.

We owe the generations coming after us, some sort of a legacy in the form of our wildlife. We have enjoyed them, and for too many years were not concerned enough about their future. It is heartening to note that more people are becoming aware of our wildlife, and are concerned about their habitat. The latest developments concerning the C.M. Russell Wildlife Refuge is just one good example.

Sincerely yours,

Al Jenkins,
Dir. Billings Rod & Gun Club
Sec. S.E. Sportsman's Ass'n.



Regional Director
U.S. Fish & Wildlife Service
Box 25486
Denver Federal Center
Denver, Colorado 80225

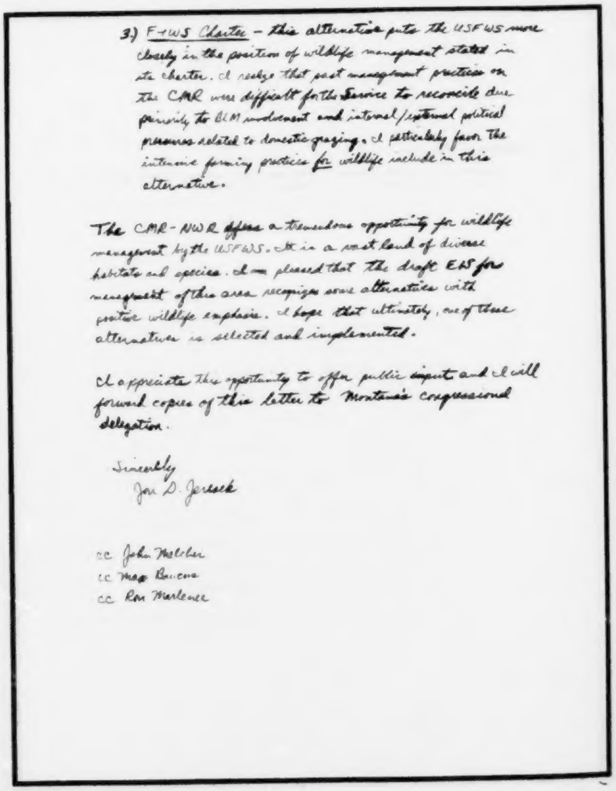
May 30, 1984

Dear Sir

I am writing concerning the draft EIS for management of the Charles M. Russell (CMR) National Wildlife Refuge (NWR). I would like to express my support for the Intensive Wildlife Management Alternative. I have several reasons why I believe this alternative should be preferred.

1) Economics - the national benefits from additional wildlife production are greatest under this alternative. Grazing fees and red meat production are small trade-offs economically, when compared to recreational values of wildlife. Also, dollars spent on wildlife related recreation have have a greater multiplier effect through more segments of the economy.

2) Threatened or Endangered Species - recovery programs for T & E species will be successful with the broadest base of public support. I believe this alternative yields the greatest public support because it shows a positive emphasis toward wildlife management. Past management of the CMR-NWR, due in part to BLM involvement, has had a narrow base of support with its emphasis on domestic grazing.



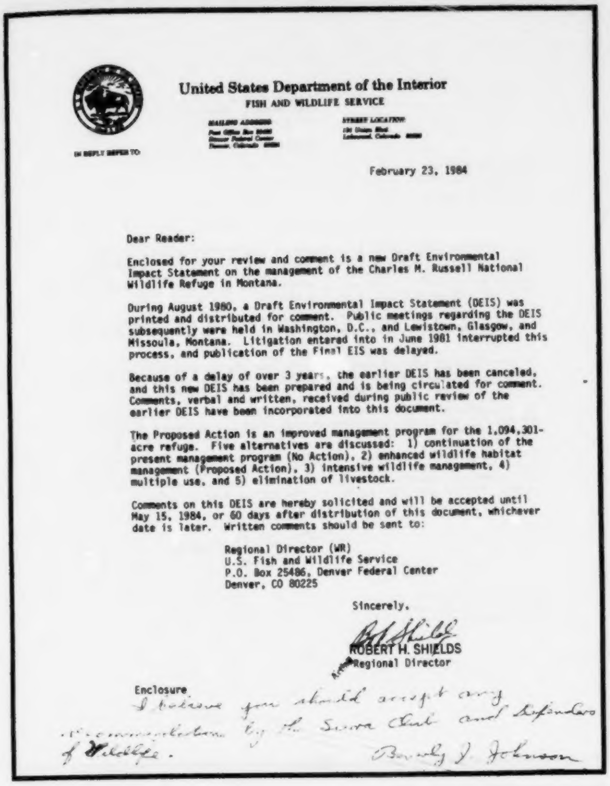
3.) F+WS Charter - this alternative puts the USFWS more closely in the position of wildlife management stated in its charter. I realize that past management practices on the CMR were difficult for the Service to reconcile due primarily to BLM involvement and internal/external political pressures related to domestic grazing. I particularly favor the intensive farming practices for wildlife include in this alternative.

The CMR-NWR offers a tremendous opportunity for wildlife management by the USFWS. It is a vast land of diverse habitats and species. I am pleased that the draft EIS for management of this area recognizes some alternatives with positive wildlife emphasis. I hope that ultimately, one of these alternatives is selected and implemented.

I appreciate this opportunity to offer public input and I will forward copies of this letter to Montana's Congressional delegation.

Sincerely
Jon D. Jerecek

cc John Melcher
cc Max Baucus
cc Ron Marlenee



United States Department of the Interior
FISH AND WILDLIFE SERVICE

MAILING ADDRESS:
Post Office Box 25486
Denver Federal Center
Denver, Colorado 80225

STREET LOCATION:
134 Union Blvd.
Lakewood, Colorado 80228

IN REPLY REFER TO:

February 23, 1984

Dear Reader:

Enclosed for your review and comment is a new Draft Environmental Impact Statement on the management of the Charles M. Russell National Wildlife Refuge in Montana.

During August 1980, a Draft Environmental Impact Statement (DEIS) was printed and distributed for comment. Public meetings regarding the DEIS subsequently were held in Washington, D.C., and Lewistown, Glasgow, and Missoula, Montana. Litigation entered into in June 1981 interrupted this process, and publication of the Final EIS was delayed.

Because of a delay of over 3 years, the earlier DEIS has been canceled, and this new DEIS has been prepared and is being circulated for comment. Comments, verbal and written, received during public review of the earlier DEIS have been incorporated into this document.

The Proposed Action is an improved management program for the 1,094,301-acre refuge. Five alternatives are discussed: 1) continuation of the present management program (No Action), 2) enhanced wildlife habitat management (Proposed Action), 3) intensive wildlife management, 4) multiple use, and 5) elimination of livestock.

Comments on this DEIS are hereby solicited and will be accepted until May 15, 1984, or 60 days after distribution of this document, whichever date is later. Written comments should be sent to:

Regional Director (WR)
U.S. Fish and Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, CO 80225

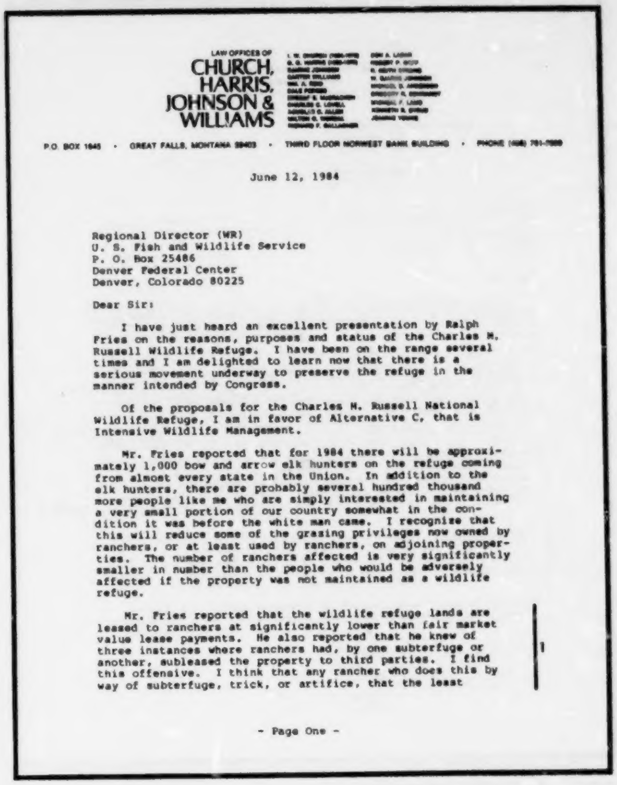
Sincerely,

Rob Shields
ROBERT H. SHIELDS
Regional Director

Enclosure

I believe you should accept any recommendation by the Sierra Club and Defenders of Wildlife.

Beverly J. Johnson



LAW OFFICES OF
CHURCH, HARRIS, JOHNSON & WILLIAMS

P.O. BOX 1645 • GREAT FALLS, MONTANA 59403 • THIRD FLOOR NORWEST BANK BUILDING • PHONE [illegible]

June 12, 1984

Regional Director (WR)
U. S. Fish and Wildlife Service
P. O. Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Sir:

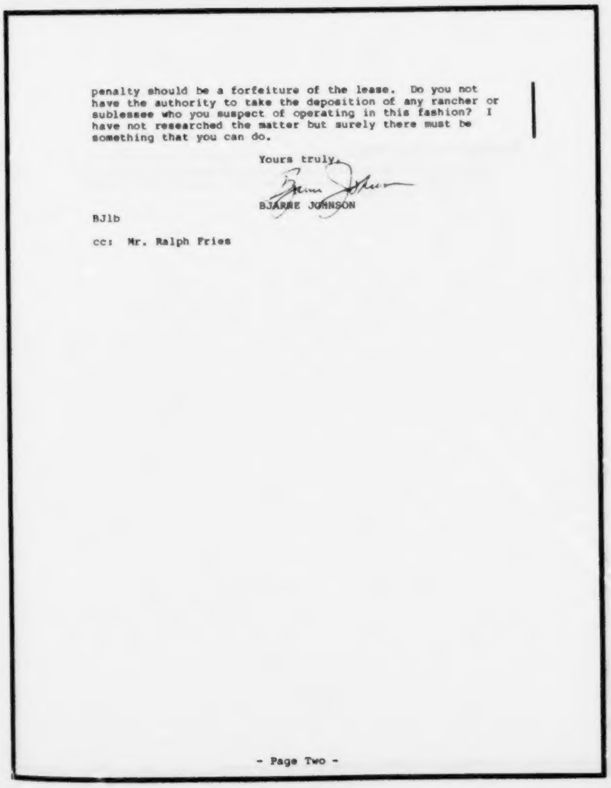
I have just heard an excellent presentation by Ralph Fries on the reasons, purposes and status of the Charles M. Russell Wildlife Refuge. I have been on the range several times and I am delighted to learn now that there is a serious movement underway to preserve the refuge in the manner intended by Congress.

Of the proposals for the Charles M. Russell National Wildlife Refuge, I am in favor of Alternative C, that is Intensive Wildlife Management.

Mr. Fries reported that for 1984 there will be approximately 1,000 bow and arrow elk hunters on the refuge coming from almost every state in the Union. In addition to the elk hunters, there are probably several hundred thousand more people like me who are simply interested in maintaining a very small portion of our country somewhat in the condition it was before the white man came. I recognize that this will reduce some of the grazing privileges now owned by ranchers, or at least used by ranchers, on adjoining properties. The number of ranchers affected is very significantly smaller in number than the people who would be adversely affected if the property was not maintained as a wildlife refuge.

Mr. Fries reported that the wildlife refuge lands are leased to ranchers at significantly lower than fair market value lease payments. He also reported that he knew of three instances where ranchers had, by one subterfuge or another, subleased the property to third parties. I find this offensive. I think that any rancher who does this by way of subterfuge, trick, or artifice, that the least 1

- Page One -



penalty should be a forfeiture of the lease. Do you not have the authority to take the deposition of any rancher or sublessee who you suspect of operating in this fashion? I have not researched the matter but surely there must be something that you can do.

Yours truly,

Bjarne Johnson
BJARNE JOHNSON

BJlb

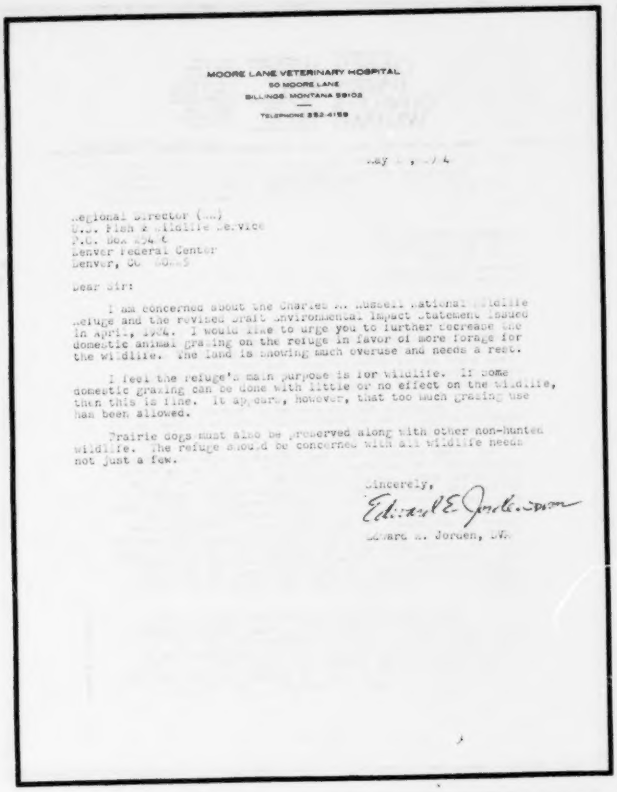
cc: Mr. Ralph Fries

- Page Two -

Response to Bjarne Johnson

1. This is a highly sensitive area in the fact that CMR does not have complete control on any of the allotments found on the Refuge. There are usually two landowners and sometimes three or four within a single allotment: FWS, BLM, State and private landowners. This complicates any issue involved on an allotment, with the major landowner having the most say on how an allotment is managed.

   Sub-leasing of grazing allotments is prohibited by National Wildlife Refuge System policy. Once the EIS is approved, FWS will address this problem.



MOORE LANE VETERINARY HOSPITAL
50 MOORE LANE
BILLINGS, MONTANA 59102
TELEPHONE 252-4159

May [illegible], 1984

Regional Director ([illegible])
U.S. Fish & Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, CO 80225

Dear Sir:

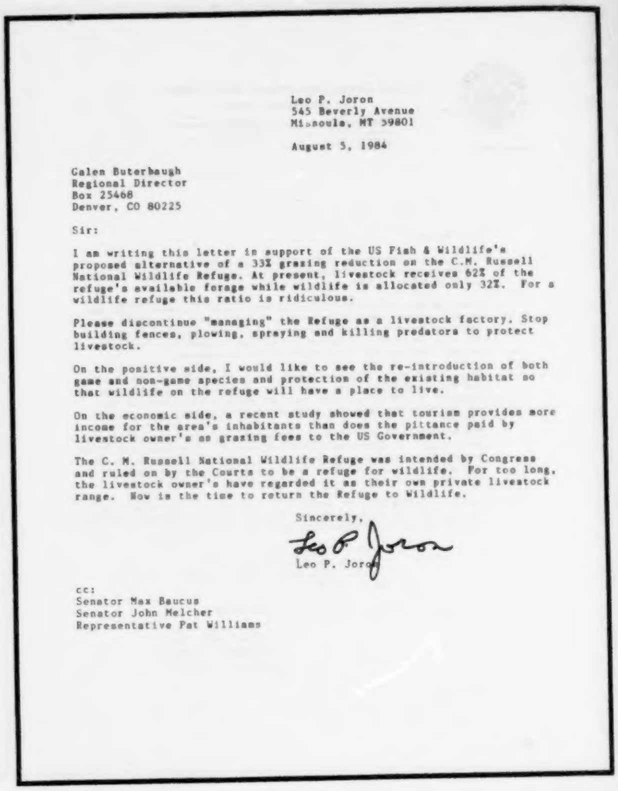
I am concerned about the Charles M. Russell National Wildlife Refuge and the revised Draft Environmental Impact Statement issued in April, 1984. I would like to urge you to further decrease the domestic animal grazing on the refuge in favor of more forage for the wildlife. The land is showing much overuse and needs a rest.

I feel the refuge's main purpose is for wildlife. If some domestic grazing can be done with little or no effect on the wildlife, then this is fine. It appears, however, that too much grazing use has been allowed.

Prairie dogs must also be preserved along with other non-hunted wildlife. The refuge should be concerned with all wildlife needs not just a few.

Sincerely,

Edward E. Jorden, DVM



Leo P. Joron
545 Beverly Avenue
Missoula, MT 59801

August 5, 1984

Galen Buterbaugh
Regional Director
Box 25468
Denver, CO 80225

Sir:

I am writing this letter in support of the US Fish & Wildlife's proposed alternative of a 33% grazing reduction on the C.M. Russell National Wildlife Refuge. At present, livestock receives 62% of the refuge's available forage while wildlife is allocated only 32%. For a wildlife refuge this ratio is ridiculous.

Please discontinue "managing" the Refuge as a livestock factory. Stop building fences, plowing, spraying and killing predators to protect livestock.

On the positive side, I would like to see the re-introduction of both game and non-game species and protection of the existing habitat so that wildlife on the refuge will have a place to live.

On the economic side, a recent study showed that tourism provides more income for the area's inhabitants than does the pittance paid by livestock owner's as grazing fees to the US Government.

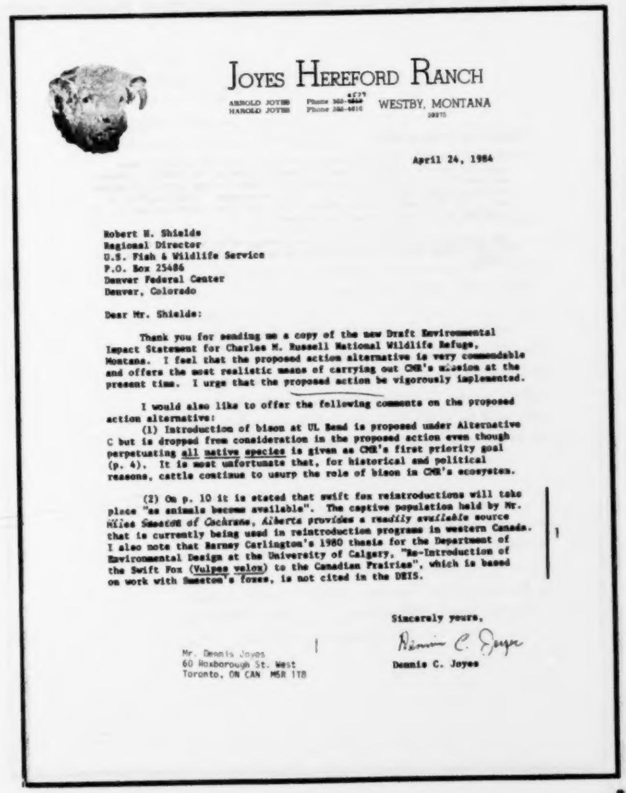
The C. M. Russell National Wildlife Refuge was intended by Congress and ruled on by the Courts to be a refuge for wildlife. For too long, the livestock owner's have regarded it as their own private livestock range. Now is the time to return the Refuge to Wildlife.

Sincerely,

Leo P. Joron

Leo P. Joron

cc:
Senator Max Baucus
Senator John Melcher
Representative Pat Williams



JOYES HEREFORD RANCH

ARNOLD JOYES Phone 385-4527
HAROLD JOYES Phone 385-4616
WESTBY, MONTANA
59275

April 24, 1984

Robert H. Shields
Regional Director
U.S. Fish & Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, Colorado

Dear Mr. Shields:

Thank you for sending me a copy of the new Draft Environmental Impact Statement for Charles M. Russell National Wildlife Refuge, Montana. I feel that the proposed action alternative is very commendable and offers the most realistic means of carrying out CMR's mission at the present time. I urge that the proposed action be vigorously implemented.

I would also like to offer the following comments on the proposed action alternative:

(1) Introduction of bison at UL Bend is proposed under Alternative C but is dropped from consideration in the proposed action even though perpetuating all native species is given as CMR's first priority goal (p. 4). It is most unfortunate that, for historical and political reasons, cattle continue to usurp the role of bison in CMR's ecosystem.

(2) On p. 10 it is stated that swift fox reintroductions will take place "as animals become available". The captive population held by Mr. *Miles Smeeton of Cochrane, Alberta provides a readily available* source that is currently being used in reintroduction programs in western Canada. I also note that Barney Carlington's 1980 thesis for the Department of Environmental Design at the University of Calgary, "Re-Introduction of the Swift Fox (Vulpes velox) to the Canadian Prairies", which is based on work with Smeeton's foxes, is not cited in the DEIS. 1

Sincerely yours,

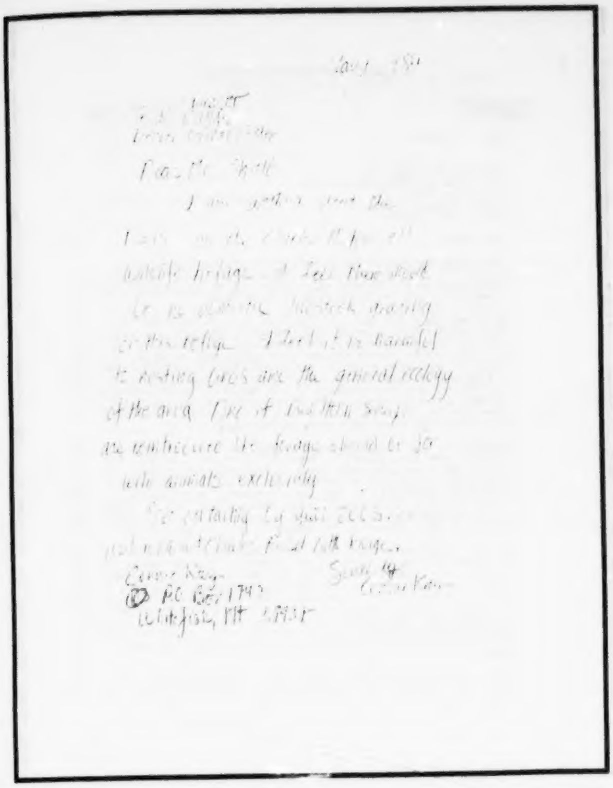
Dennis C. Joyes

Dennis C. Joyes

Mr. Dennis Joyes
60 Roxborough St. West
Toronto, ON CAN M5R 1T8

Response to Dennis C. Joyes

1. Thank you for the helpful information on swift fox. We will follow up on your lead following the Record of Decision, providing reintroduction of the swift fox is approved.



May [illegible] 1984

[illegible]
Denver Federal Center

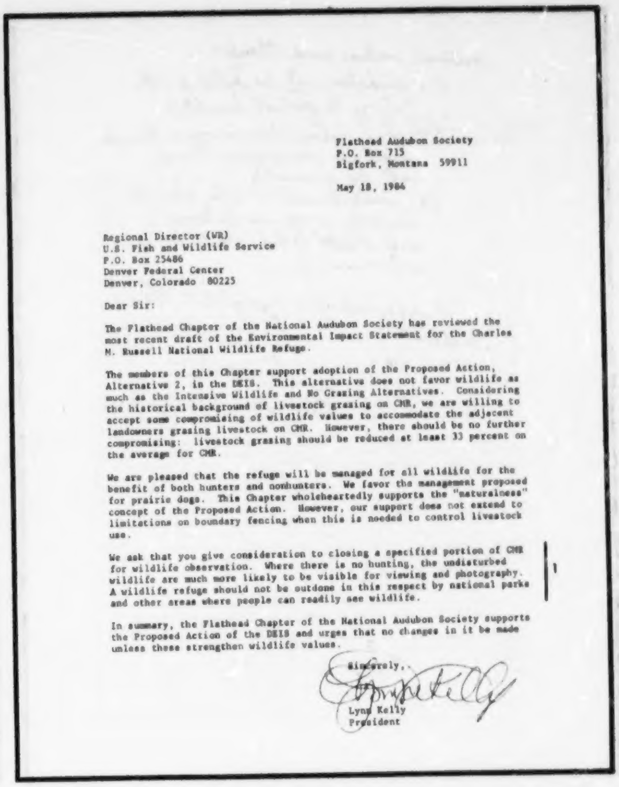
Dear Mr. [illegible]

I am writing about the DEIS on the Charles M. Russell Wildlife Refuge. I feel there should be no livestock grazing on this refuge. I feel it is harmful to nesting birds and the general ecology of the area. Due to this being a wildlife refuge the forage should be for wild animals exclusively.

I'm [illegible] EIS [illegible] Charles Russell Wild Refuge.

Connie Kern
PO Box 1743
Whitefish, MT 59937

Sincerely
Connie Kern



Flathead Audubon Society
P.O. Box 715
Bigfork, Montana 59911

May 18, 1984

Regional Director (WR)
U.S. Fish and Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Sir:

The Flathead Chapter of the National Audubon Society has reviewed the most recent draft of the Environmental Impact Statement for the Charles M. Russell National Wildlife Refuge.

The members of this Chapter support adoption of the Proposed Action, Alternative 2, in the DEIS. This alternative does not favor wildlife as much as the Intensive Wildlife and No Grazing Alternatives. Considering the historical background of livestock grazing on CMR, we are willing to accept some compromising of wildlife values to accommodate the adjecent landowners grazing livestock on CMR. However, there should be no further compromising: livestock grazing should be reduced at least 33 percent on the average for CMR.

We are pleased that the refuge will be managed for all wildlife for the benefit of both hunters and nonhunters. We favor the management proposed for prairie dogs. This Chapter wholeheartedly supports the "naturalness" concept of the Proposed Action. However, our support does not extend to limitations on boundary fencing when this is needed to control livestock use.

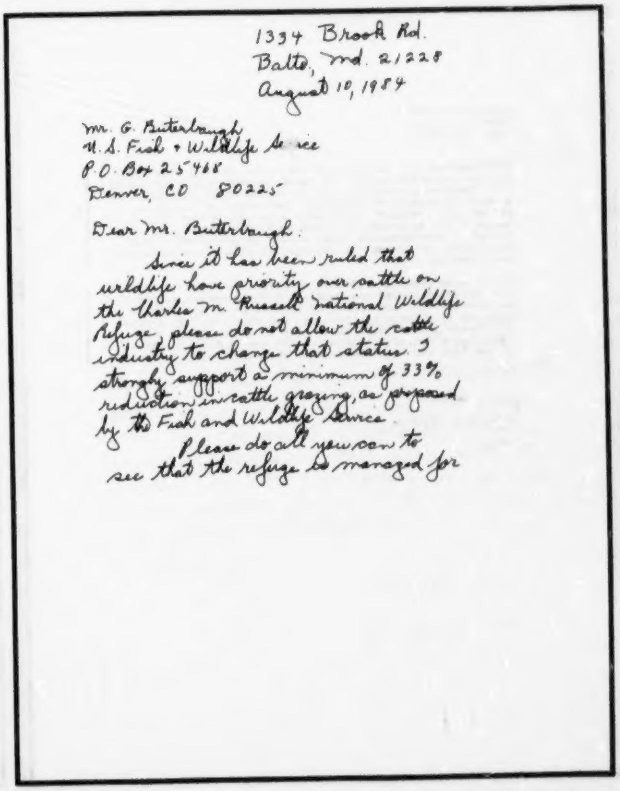
We ask that you give consideration to closing a specified portion of CMR for wildlife observation. Where there is no hunting, the undisturbed wildlife are much more likely to be visible for viewing and photography. A wildlife refuge should not be outdone in this respect by national parks and other areas where people can readily see wildlife. 1

In summary, the Flathead Chapter of the National Audubon Society supports the Proposed Action of the DEIS and urges that no changes in it be made unless these strengthen wildlife values.

Sincerely,
Lynn Kelly
Lynn Kelly
President

Response to Lynn Kelly

1. Please refer to response to the Montana Audubon Council on page 279 concerning closing a portion of CMR for wildlife observation.



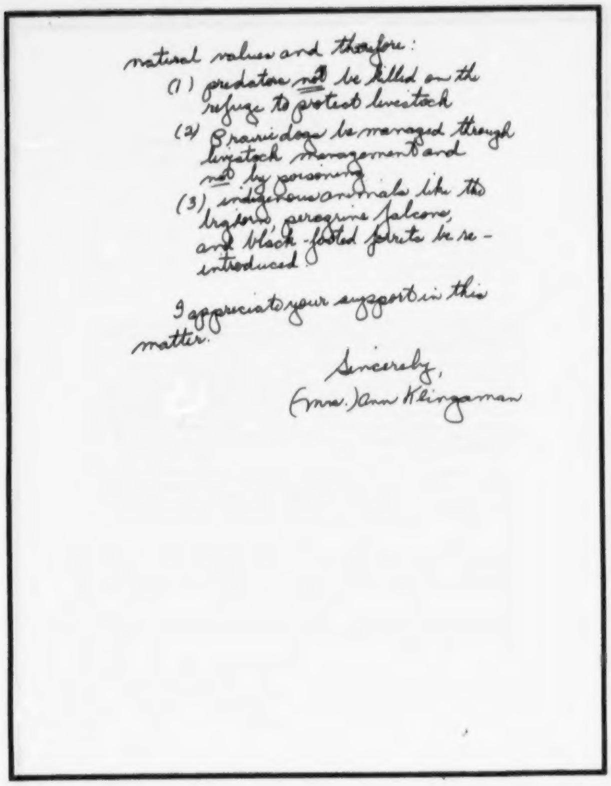
1334 Brook Rd.
Balto, Md. 21228
August 10, 1984

Mr. G. Buterbaugh
U.S. Fish + Wildlife Service
P.O. Box 25468
Denver, CO 80225

Dear Mr. Butterbaugh:

Since it has been ruled that wildlife have priority over cattle on the Charles M. Russell National Wildlife Refuge, please do not allow the cattle industry to change that status. I strongly support a minimum of 33% reduction in cattle grazing, as proposed by the Fish and Wildlife Service.

Please do all you can to see that the refuge is managed for


natural values and therefore:

(1) predators not be killed on the refuge to protect livestock

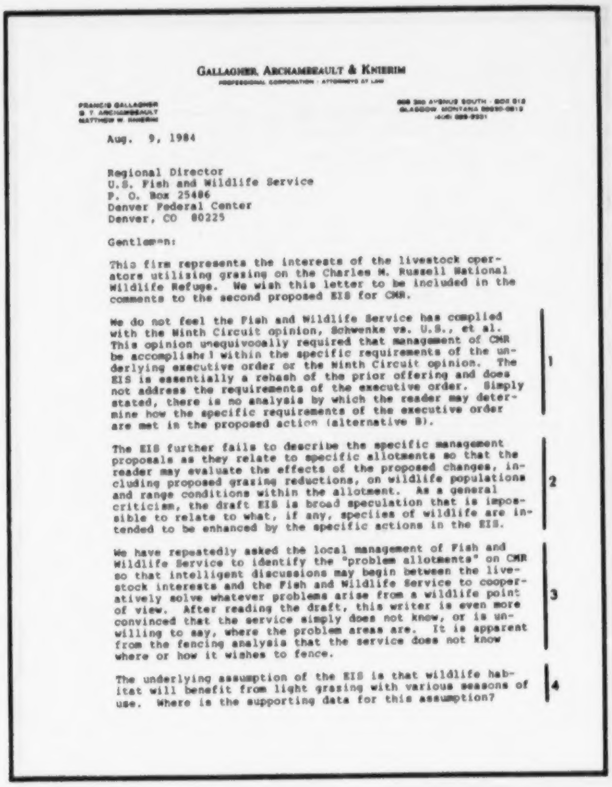
(2) Prairie dogs be managed through livestock management and not by poisoning

(3) indigenous animals like the bighorns, peregrine falcons, and black-footed ferrets be re-introduced.

I appreciate your support in this matter.

Sincerely,

(Mrs.) Ann Klingaman


GALLAGHER, ARCHAMBEAULT & KNIERIM
PROFESSIONAL CORPORATION · ATTORNEYS AT LAW

FRANCIS GALLAGHER
G. T. ARCHAMBEAULT
MATTHEW W. KNIERIM

[illegible] 3RD AVENUE SOUTH · BOX [illegible]
GLASGOW, MONTANA [illegible]
(406) [illegible]

Aug. 9, 1984

Regional Director
U.S. Fish and Wildlife Service
P. O. Box 25486
Denver Federal Center
Denver, CO 80225

Gentlemen:

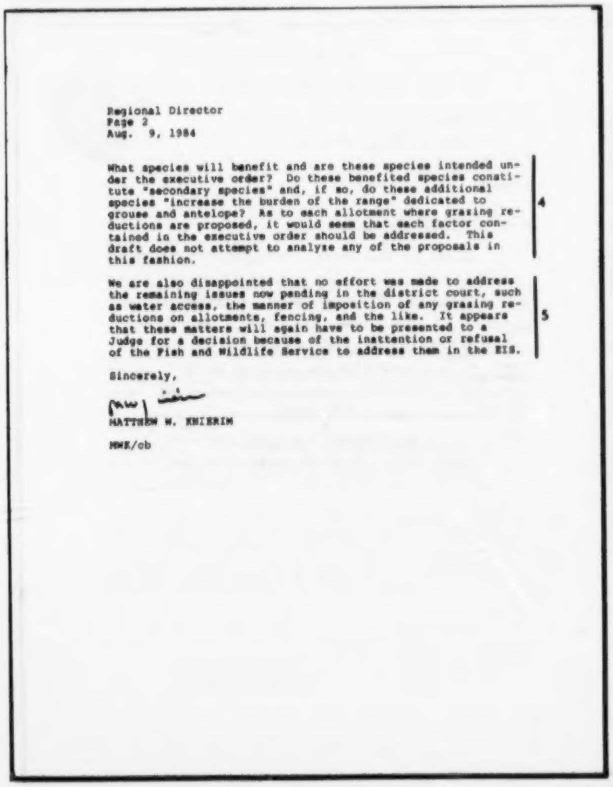
This firm represents the interests of the livestock operators utilizing grazing on the Charles M. Russell National Wildlife Refuge. We wish this letter to be included in the comments to the second proposed EIS for CMR.

We do not feel the Fish and Wildlife Service has complied with the Ninth Circuit opinion, Schwenke vs. U.S., et al. This opinion unequivocally required that management of CMR be accomplished within the specific requirements of the underlying executive order or the Ninth Circuit opinion. The EIS is essentially a rehash of the prior offering and does not address the requirements of the executive order. Simply stated, there is no analysis by which the reader may determine how the specific requirements of the executive order are met in the proposed action (alternative B). 1

The EIS further fails to describe the specific management proposals as they relate to specific allotments so that the reader may evaluate the effects of the proposed changes, including proposed grazing reductions, on wildlife populations and range conditions within the allotment. As a general criticism, the draft EIS is broad speculation that is impossible to relate to what, if any, species of wildlife are intended to be enhanced by the specific actions in the EIS. 2

We have repeatedly asked the local management of Fish and Wildlife Service to identify the "problem allotments" on CMR so that intelligent discussions may begin between the livestock interests and the Fish and Wildlife Service to cooperatively solve whatever problems arise from a wildlife point of view. After reading the draft, this writer is even more convinced that the service simply does not know, or is unwilling to say, where the problem areas are. It is apparent from the fencing analysis that the service does not know where or how it wishes to fence. 3

The underlying assumption of the EIS is that wildlife habitat will benefit from light grazing with various seasons of use. Where is the supporting data for this assumption? 4


Regional Director
Page 2
Aug. 9, 1984

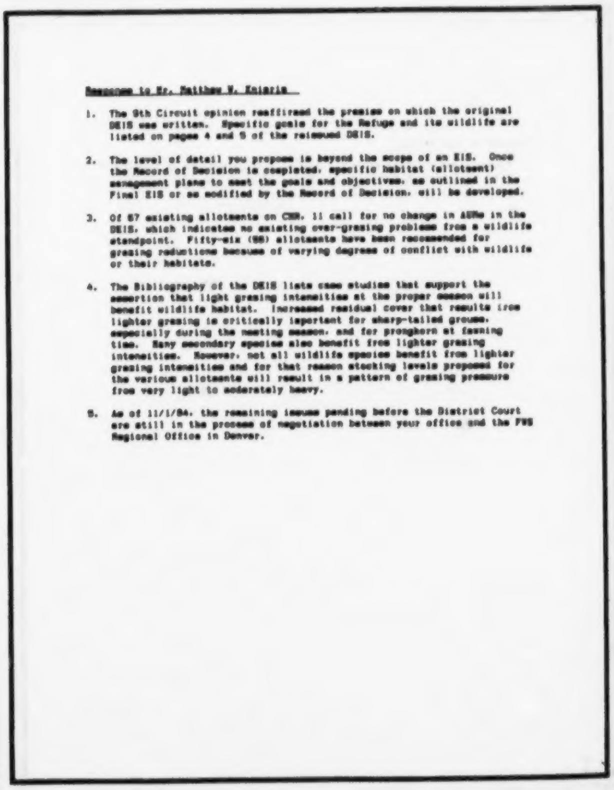
What species will benefit and are these species intended under the executive order? Do these benefited species constitute "secondary species" and, if so, do these additional species "increase the burden of the range" dedicated to grouse and antelope? As to each allotment where grazing reductions are proposed, it would seem that each factor contained in the executive order should be addressed. This draft does not attempt to analyze any of the proposals in this fashion. 4

We are also disappointed that no effort was made to address the remaining issues now pending in the district court, such as water access, the manner of imposition of any grazing reductions on allotments, fencing, and the like. It appears that these matters will again have to be presented to a Judge for a decision because of the inattention or refusal of the Fish and Wildlife Service to address them in the EIS. 5

Sincerely,

MATTHEW W. KNIERIM

MWK/cb


Response to Mr. Matthew W. Knierim

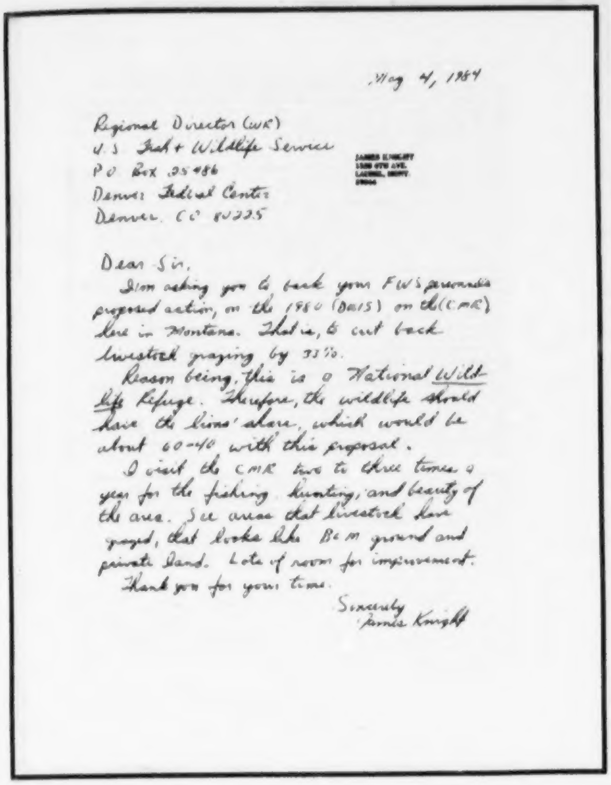
1. The 9th Circuit opinion reaffirmed the premise on which the original DEIS was written. Specific goals for the Refuge and its wildlife are listed on pages 4 and 5 of the reissued DEIS.

2. The level of detail you propose is beyond the scope of an EIS. Once the Record of Decision is completed, specific habitat (allotment) management plans to meet the goals and objectives, as outlined in the Final EIS or as modified by the Record of Decision, will be developed.

3. Of 67 existing allotments on CMR, 11 call for no change in AUMs in the DEIS, which indicates no existing over-grazing problems from a wildlife standpoint. Fifty-six (56) allotments have been recommended for grazing reductions because of varying degrees of conflict with wildlife or their habitats.

4. The Bibliography of the DEIS lists case studies that support the assertion that light grazing intensities at the proper season will benefit wildlife habitat. Increased residual cover that results from lighter grazing is critically important for sharp-tailed grouse, especially during the nesting season, and for pronghorn at fawning time. Many secondary species also benefit from lighter grazing intensities. However, not all wildlife species benefit from lighter grazing intensities and for that reason stocking levels proposed for the various allotments will result in a pattern of grazing pressure from very light to moderately heavy.

5. As of 11/1/84, the remaining issues pending before the District Court are still in the process of negotiation between your office and the FWS Regional Office in Denver.



May 4, 1984

Regional Director (WR)
U.S. Fish + Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, CO 80225

JAMES KNIGHT
[illegible] 6TH AVE.
LAUREL, MONT.
59044

Dear Sir,

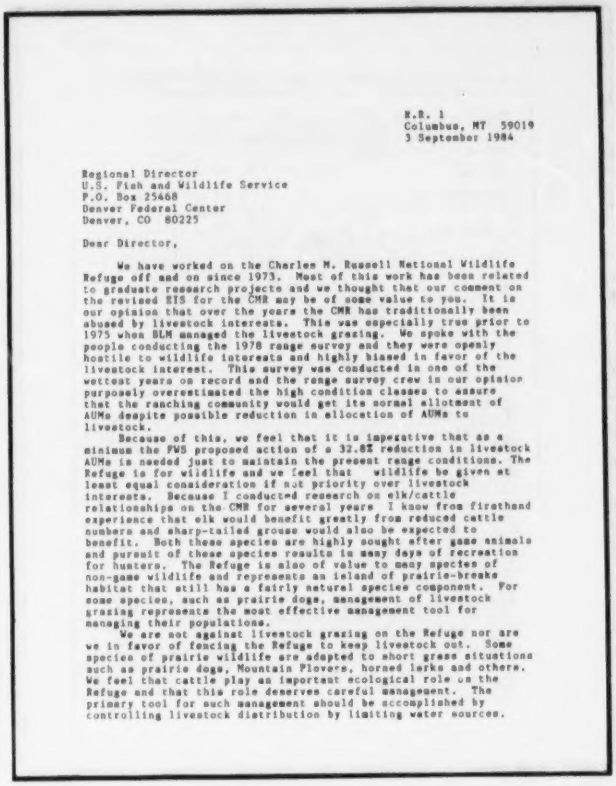
I'm asking you to back your FWS personnel's proposed action, on the 1980 (DEIS) on the (CMR) here in Montana. That is, to cut back livestock grazing by 33%.

Reason being, this is a National Wild-life Refuge. Therefore, the wildlife should have the lions' share, which would be about 60-40 with this proposal.

I visit the CMR two to three times a year for the fishing, hunting, and beauty of the area. See areas that livestock have grazed, that looks like BLM ground and private land. Lots of room for improvement.

Thank you for your time.

Sincerely
James Knight



R.R. 1
Columbus, MT 59019
3 September 1984

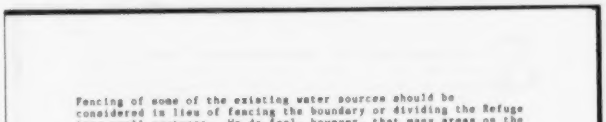
Regional Director
U.S. Fish and Wildlife Service
P.O. Box 25468
Denver Federal Center
Denver, CO 80225

Dear Director,

We have worked on the Charles M. Russell National Wildlife Refuge off and on since 1973. Most of this work has been related to graduate research projects and we thought that our comment on the revised EIS for the CMR may be of some value to you. It is our opinion that over the years the CMR has traditionally been abused by livestock interests. This was especially true prior to 1975 when BLM managed the livestock grazing. We spoke with the people conducting the 1978 range survey and they were openly hostile to wildlife interests and highly biased in favor of the livestock interest. This survey was conducted in one of the wettest years on record and the range survey crew in our opinion purposely overestimated the high condition classes to assure that the ranching community would get its normal allotment of AUMs despite possible reduction in allocation of AUMs to livestock.

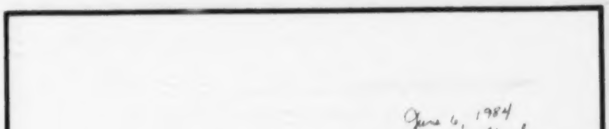
Because of this, we feel that it is imperative that as a minimum the FWS proposed action of a 32.8% reduction in livestock AUMs is needed just to maintain the present range conditions. The Refuge is for wildlife and we feel that wildlife be given at least equal consideration if not priority over livestock interests. Because I conducted research on elk/cattle relationships on the CMR for several years I know from firsthand experience that elk would benefit greatly from reduced cattle numbers and sharp-tailed grouse would also be expected to benefit. Both these species are highly sought after game animals and pursuit of these species results in many days of recreation for hunters. The Refuge is also of value to many species of non-game wildlife and represents an island of prairie-breaks habitat that still has a fairly natural species component. For some species, such as prairie dogs, management of livestock grazing represents the most effective management tool for managing their populations.

We are not against livestock grazing on the Refuge nor are we in favor of fencing the Refuge to keep livestock out. Some species of prairie wildlife are adapted to short grass situations such as prairie dogs, Mountain Plovers, horned larks and others. We feel that cattle play an important ecological role on the Refuge and that this role deserves careful management. The primary tool for such management should be accomplished by controlling livestock distribution by limiting water sources.



Fencing of some of the existing water sources should be considered in lieu of fencing the boundary or dividing the Refuge into small pastures. We do feel, however, that many areas on the Refuge are grazed heavily enough that it is a detriment to many wildlife species and the range resource. We feel that now is the time to act on this problem.

Sincerely,
Craig J. Knowles
Pamela R. Knowles
Dr. Craig J. Knowles
Pamela R. Knowles



June 6, 1984
112 19 St. S.
Great Falls MT 59401

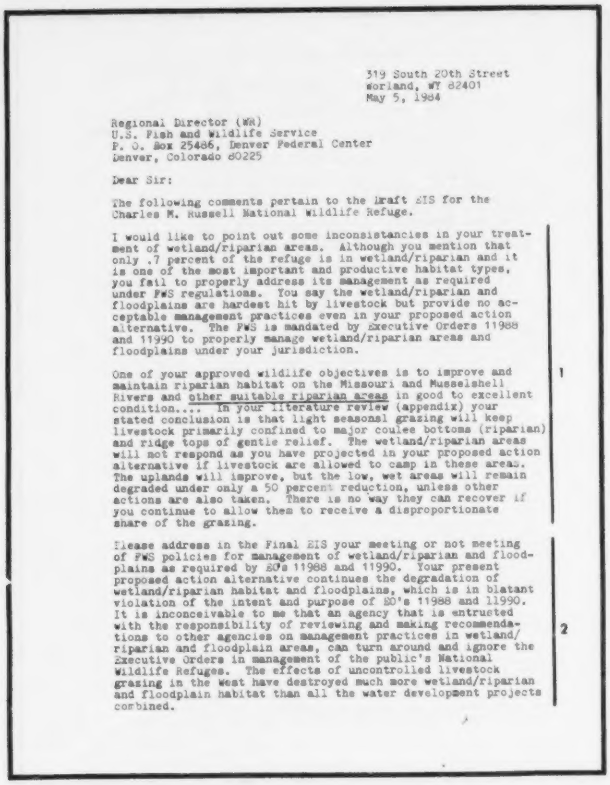
Regional Director (W R.)
U S Fish & Wildlife Service
P O Box 25486 Denver Fed. Center
Denver, CO 80225

Dear Sir or Madam,

I am writing to express my support for Alternative B of the C M Russell Wildlife Refuge Draft Environmental Impact Statement. It is my feeling that this option best represents a balance between competing demands and will serve the long-term interests of all Montanans. I urge you to do whatever you can to see that this alternative is adopted.

Thank you.

Sincerely,
Jennifer Kolmes



319 South 20th Street
Worland, WY 82401
May 5, 1984

Regional Director (WR)
U.S. Fish and Wildlife Service
P. O. Box 25486, Denver Federal Center
Denver, Colorado 80225

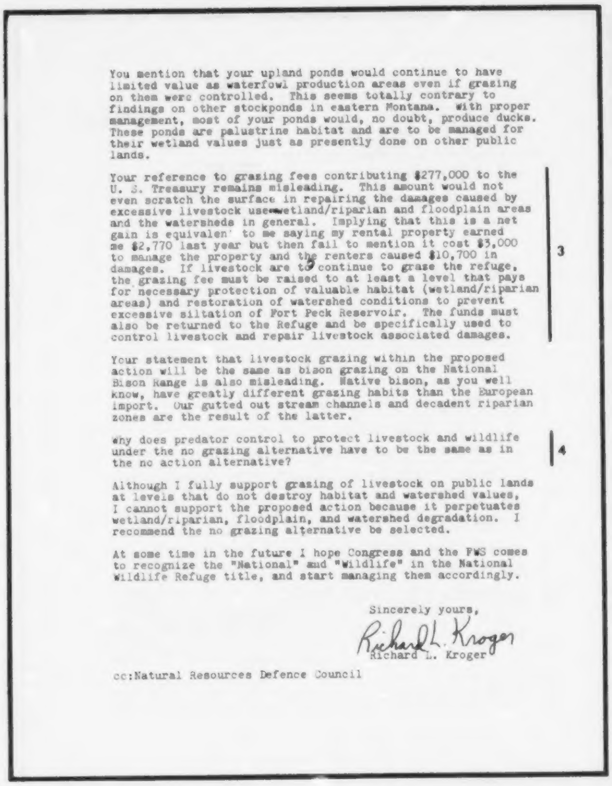
Dear Sir:

The following comments pertain to the Draft EIS for the Charles M. Russell National Wildlife Refuge.

I would like to point out some inconsistancies in your treatment of wetland/riparian areas. Although you mention that only .7 percent of the refuge is in wetland/riparian and it is one of the most important and productive habitat types, you fail to properly address its management as required under FWS regulations. You say the wetland/riparian and floodplains are hardest hit by livestock but provide no acceptable management practices even in your proposed action alternative. The FWS is mandated by Executive Orders 11988 and 11990 to properly manage wetland/riparian areas and floodplains under your jurisdiction.

One of your approved wildlife objectives is to improve and maintain riparian habitat on the Missouri and Musselshell Rivers and other suitable riparian areas in good to excellent condition.... In your literature review (appendix) your stated conclusion is that light seasonal grazing will keep livestock primarily confined to major coulee bottoms (riparian) and ridge tops of gentle relief. The wetland/riparian areas will not respond as you have projected in your proposed action alternative if livestock are allowed to camp in these areas. The uplands will improve, but the low, wet areas will remain degraded under only a 50 percent reduction, unless other actions are also taken. There is no way they can recover if you continue to allow them to receive a disproportionate share of the grazing. 1

Please address in the Final EIS your meeting or not meeting of FWS policies for management of wetland/riparian and floodplains as required by EO's 11988 and 11990. Your present proposed action alternative continues the degradation of wetland/riparian habitat and floodplains, which is in blatant violation of the intent and purpose of EO's 11988 and 11990. It is inconceivable to me that an agency that is entrusted with the responsibility of reviewing and making recommendations to other agencies on management practices in wetland/riparian and floodplain areas, can turn around and ignore the Executive Orders in management of the public's National Wildlife Refuges. The effects of uncontrolled livestock grazing in the West have destroyed much more wetland/riparian and floodplain habitat than all the water development projects combined. 2



You mention that your upland ponds would continue to have limited value as waterfowl production areas even if grazing on them were controlled. This seems totally contrary to findings on other stockponds in eastern Montana. With proper management, most of your ponds would, no doubt, produce ducks. These ponds are palustrine habitat and are to be managed for their wetland values just as presently done on other public lands.

Your reference to grazing fees contributing $277,000 to the U. S. Treasury remains misleading. This amount would not even scratch the surface in repairing the damages caused by excessive livestock use wetland/riparian and floodplain areas and the watersheds in general. Implying that this is a net gain is equivalent to me saying my rental property earned me $2,770 last year but then fail to mention it cost $3,000 to manage the property and the renters caused $10,700 in damages. If livestock are to continue to graze the refuge, the grazing fee must be raised to at least a level that pays for necessary protection of valuable habitat (wetland/riparian areas) and restoration of watershed conditions to prevent excessive siltation of Fort Peck Reservoir. The funds must also be returned to the Refuge and be specifically used to control livestock and repair livestock associated damages. 3

Your statement that livestock grazing within the proposed action will be the same as bison grazing on the National Bison Range is also misleading. Native bison, as you well know, have greatly different grazing habits than the European import. Our gutted out stream channels and decadent riparian zones are the result of the latter.

Why does predator control to protect livestock and wildlife under the no grazing alternative have to be the same as in the no action alternative? 4

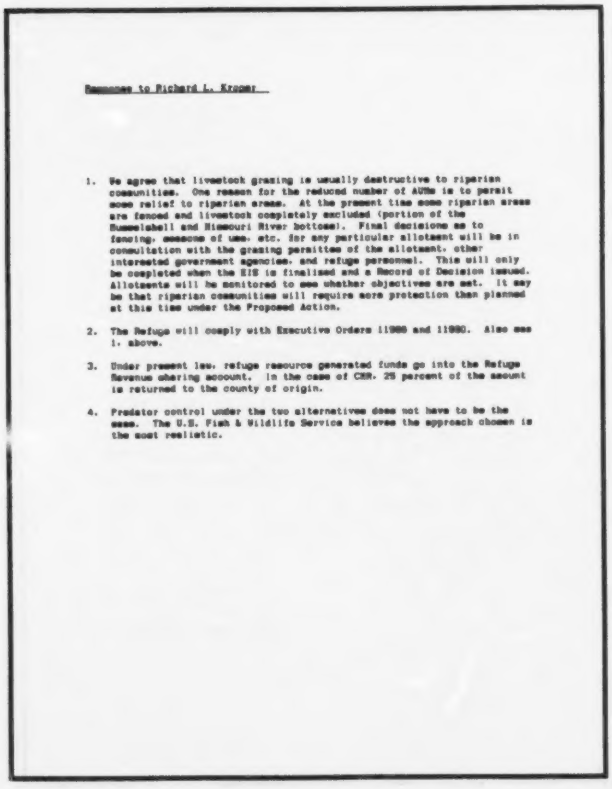
Although I fully support grazing of livestock on public lands at levels that do not destroy habitat and watershed values, I cannot support the proposed action because it perpetuates wetland/riparian, floodplain, and watershed degradation. I recommend the no grazing alternative be selected.

At some time in the future I hope Congress and the FWS comes to recognize the "National" and "Wildlife" in the National Wildlife Refuge title, and start managing them accordingly.

Sincerely yours,

Richard L. Kroger
Richard L. Kroger

cc:Natural Resources Defence Council



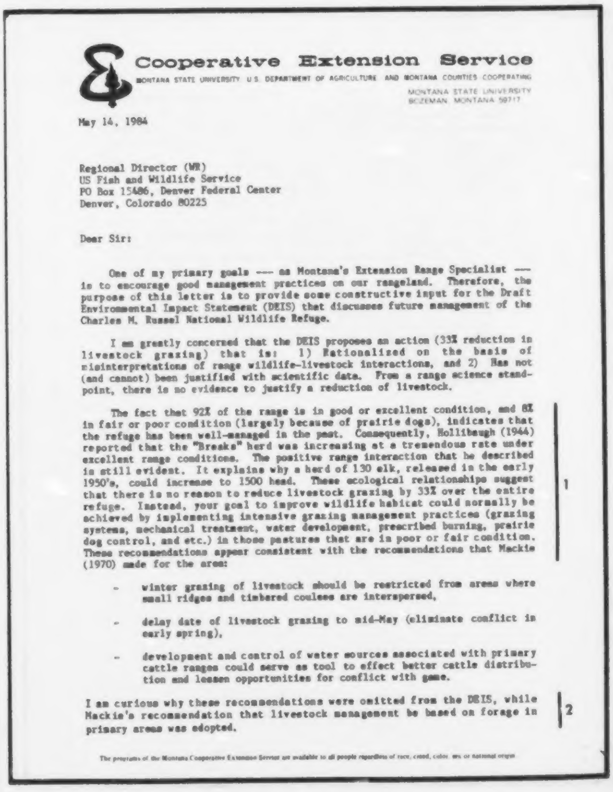
Response to Richard L. Kroger

1. We agree that livestock grazing is usually destructive to riparian communities. One reason for the reduced number of AUMs is to permit some relief to riparian areas. At the present time some riparian areas are fenced and livestock completely excluded (portion of the Musselshell and Missouri River bottoms). Final decisions as to fencing, seasons of use, etc. for any particular allotment will be in consultation with the grazing permittee of the allotment, other interested government agencies, and refuge personnel. This will only be completed when the EIS is finalized and a Record of Decision issued. Allotments will be monitored to see whether objectives are met. It may be that riparian communities will require more protection than planned at this time under the Proposed Action.

2. The Refuge will comply with Executive Orders 11988 and 11990. Also see 1. above.

3. Under present law, refuge resource generated funds go into the Refuge Revenue sharing account. In the case of CMR, 25 percent of the amount is returned to the county of origin.

4. Predator control under the two alternatives does not have to be the same. The U.S. Fish & Wildlife Service believes the approach chosen is the most realistic.



Cooperative Extension Service
MONTANA STATE UNIVERSITY U.S. DEPARTMENT OF AGRICULTURE AND MONTANA COUNTIES COOPERATING
MONTANA STATE UNIVERSITY
BOZEMAN, MONTANA 59717

May 14, 1984

Regional Director (WR)
US Fish and Wildlife Service
PO Box 15486, Denver Federal Center
Denver, Colorado 80225

Dear Sir:

One of my primary goals --- as Montana's Extension Range Specialist --- is to encourage good management practices on our rangeland. Therefore, the purpose of this letter is to provide some constructive input for the Draft Environmental Impact Statement (DEIS) that discusses future management of the Charles M. Russel National Wildlife Refuge.

I am greatly concerned that the DEIS proposes an action (33% reduction in livestock grazing) that is: 1) Rationalized on the basis of misinterpretations of range wildlife-livestock interactions, and 2) Has not (and cannot) been justified with scientific data. From a range science standpoint, there is no evidence to justify a reduction of livestock.

The fact that 92% of the range is in good or excellent condition, and 8% in fair or poor condition (largely because of prairie dogs), indicates that the refuge has been well-managed in the past. Consequently, Hollibaugh (1944) reported that the "Breaks" herd was increasing at a tremendous rate under excellent range conditions. The positive range interaction that he described is still evident. It explains why a herd of 130 elk, released in the early 1950's, could increase to 1500 head. These ecological relationships suggest that there is no reason to reduce livestock grazing by 33% over the entire refuge. Instead, your goal to improve wildlife habitat could normally be achieved by implementing intensive grazing management practices (grazing systems, mechanical treatment, water development, prescribed burning, prairie dog control, and etc.) in those pastures that are in poor or fair condition. These recommendations appear consistent with the recommendations that Mackie (1970) made for the area: 1

- winter grazing of livestock should be restricted from areas where small ridges and timbered coulees are interspersed,
- delay date of livestock grazing to mid-May (eliminate conflict in early spring),
- development and control of water sources associated with primary cattle ranges could serve as tool to effect better cattle distribution and lessen opportunities for conflict with game.

I am curious why these recommendations were omitted from the DEIS, while Mackie's recommendation that livestock management be based on forage in primary areas was adopted. 2

The programs of the Montana Cooperative Extension Service are available to all people regardless of race, creed, color, sex or national origin

The point that needs to be made is --- there is no justification for a 33% reduction in livestock grazing. Livestock are stocked on the Refuge at about 14 acres per AUM (60,000 AUMs for 850,000 acres of land), this is much lighter than the rate (3-5 acres per AUM) at which most range in eastern Montana is stocked. Average productivity (lbs. forage/acre) of 18 range sites on the Refuge is summarized in Appendix Table 6a. Average production (divide sum average yield per site by number of sites) is 1005.5 lbs/acre in a normal rainfall year. If we assume that 75% of the herbage is potentially usable as livestock forage --- there is 754.2 lbs. of livestock forage per acre. On 14 acres, there would be a total of 10,558 lbs. available. Because an animal unit requires about 660 lbs. of air dry forage per month (not 1000 lbs. as defined in your glossary), about 6% of the "usable" forage is consumed by livestock. If it is assumed that an equal amount is lost due to trampling, the total livestock use of "usable" forage is 12%. Livestock use simply can not exceed the 33% level that your report considers excessive.

The DEIS presents a biased overview of wildlife-livestock interaction. Although it does not present data that indicates livestock grazing is conflicting with wildlife on the CMR, it does discuss some studies (many in the more arid southwest) that report conflicts between wildlife and livestock. However, published literature contains many examples where wildlife habitat was improved by livestock grazing. A few examples include: Yoakum (1983) describes the interaction of antelope on properly-managed rangelands; Cole (1958) recognized circumstances where big game species benefit from heavy livestock grazing; Neal (No date) described how to improve deer winter range with livestock grazing; Hilken and Vavra (1981) described grazing management practices that minimized the competition between deer and cattle; Willms, et.al. (1979) found that moderate or heavy fall grazing by cattle made the spring forage more attractive to deer; Campbell and Johnson (1983) reported minimal (15%) dietary overlap between mule deer and cattle, and some overlap between cattle and mountain goats when cattle were grazing within the goats' range. In addition, as a general rule, most of us recognize that water developments are consistent with wildlife objectives.

The above studies are proof that livestock-wildlife interactions not only are complex, but that they can also be compatible. Therefore, rather than initially reducing livestock grazing by 33%, the existing situation (on each allotment) needs to be described in terms of big game populations, current forage utilization, reproductive rates of wildlife populations, and range trend. Once the environmental situation is adequately described, a monitoring program is needed! Environmental tinkering such as livestock grazing adjustments should not be initiated until the ecosystem is fully understood.

Why were the properties of game populations (criteria of density, types of population curves, saturation point and carrying capacity) ignored in the DEIS? This information is needed to analyze the environmental consequences of the proposed action. Without doubt, when the carrying capacity of range is exceeded by wildlife (as with livestock), there will be environmental degradation. The potential destruction of soil and vegetation (within the Refuge and on private land bordering the Refuge) by wildlife needs to be addressed more carefully. 3

The importance of utilization, population levels and stocking rates in the CMR was also expressed in Mackie's (1970) report. He warns us that:

> "mule deer, in particular, should be more rigidly controlled by adequate hunter harvests and maintained at levels which will permit regeneration or replacement of deteriorated browse plants and sustainment of deer populations".

Likewise,

> "the potential impact of elk on the biota of the Missouri River Breaks should be recognized and given foremost consideration in the management of existing game populations, in introduction of new animal species to the area, and in relation to introduction of elk into other areas along the Missouri River or similar habitat in eastern Montana where 'multiple use' is the object of management. Greater than existing numbers of elk are not likely to be compatible with management to sustain forage supplies and populations of mule deer within the present elk range". 4

Although range condition and wildlife habitat may not be exactly the same and probably should not be used synonymously, the concept of range condition as developed by Clements and Dyksterhuis and used by the SCS, indirectly considers residual cover, vegetative diversity, and other wildlife habitat components. The fact that the climax community (excellent range condition) is the most diverse and stable community has been proven by Odum, Kormondy and many other ecologists! By discarding the scientifically accepted quantitative climax approach and using your habitat evaluation procedure (HEP), you have undermined the validity of the DEIS. 5

A more realistic approach to wildlife habitat would have been to use the ecological site potential (Shelford, 1963; Thomas 1979). Yoakum (1983) writes that "a cardinal rule of wildlife habitat management is that when an environment exists in good condition achieving its ecological site potential, then maintain that site in that good condition. The site will support the variety of wildlife species that has adapted over centuries to that ecosystem."

Following Yoakum's cardinal rule will not meet all management objectives, such as producing maximum number of antelope. For example, some ponderosa pine-juniper communities in the CMR have a fairly dense canopy cover. If this is the site's natural potential, it will not support a large antelope population. Because the site has a low carrying capacity for antelope, management should not expect the site to produce more antelope.

I feel that Yoakum's (a wildlife biologist for the USDI) philosophy poses some serious questions about your evaluation of the wildlife habitat on the refuge. Is it really in fair condition? This is a critical issue because the criteria value of 10 may not be possible on the CMR where the environmental potential is relatively low in comparison to areas of higher precipitation where many of the criteria were formulated. I also need to know whether your subjective rating was based on past management or site potential? If it is site potential, as Appendix Table 2h suggests (for example: distance to water, alfalfa fields, tract size, suitable perches, human disturbance, topography, forest canopy, tree size, coulee availability, water availability, denning sites, nesting cavities, rock outcrops, distance to cropland, distance to interspersed land, dbh of trees, and etc.), then reducing livestock grazing will have very little effect on your wildlife habitat rating. However, livestock grazing can be used to influence shrub, forb and grass composition on rangelands. 6

The methodology that you used to calculate the AUMs on the CMR refuge also contains several conceptual deficiencies. My experience indicates that livestock move farther from water and use steeper slopes when they are actively grazing. Thus, your approach of considering location (distance from water and slope) of all livestock observations exagerates the dependence of livestock on specific concentration areas. A more realistic measure of foraging behavior would have been obtained if only the locations (slope and distance from water) of cattle while they were grazing had been used.

The slope-water matrix that you used is not a valid model to justify large livestock reductions. For example, not only do cattle graze farther from water in the cooler weather, but thunderstorms frequently provide additional water sources in the Breaks. Unfortunately, your matrix ignores both considerations. In addition, the high erosion potential of certain soil types eliminated AUM recommendations on some sites. If these reductions were in addition to the deductions for slope and water (as stated on page 216) then it is highly probable that livestock AUMs could have been removed from a section because of a steep slope --- but then additional AUMs could be removed from the section because the soils "on the same steep slope" were erodible. This type of double-dipping logic should not be used in any DEIS. 7

According to your economic analysis (page 26), none of the alternatives have a significant effect on income or employment in the 6-county region. Likewise, it is stated that the "effect on ranchers is relatively insignificant". These statements suggest that your socio-economic analysis needs to be redone.

Your economic analysis should never have been based on one year's data. By using the cost and return data for 1979 --- you have based your economic analysis on the best year that ranchers have had over the last 20 years. Consequently, the detrimental effect of the proposed action on the ranchers and local economy is seriously understated. When the economic analysis is redone --- the cost and return data should represent an average of several years.

In summary, I feel it is necessary to re-emphasize the following points:

1) the 33% overall reduction in livestock grazing is completely unwarranted,

2) the methodology used to evaluate wildlife habitat and to calculate the proposed livestock reductions are not scientifically sound,

3) the positive interaction of wildlife and livestock was conspicuously absent from the DEIS, and

4) the economic analysis of the effect of the proposed action on the affected ranchers and local economy needs to be redone,

5) at this time, there is not enough good data available to risk the implementation of the proposed management changes on the CMR. We do not know if we have a problem. Because of the CMR's economic importance, an intensive monitoring program (aimed at understanding the wildlife-livestock interaction on an allotment-by-allotment basis) would be a more desirable use of our resources. If the 3-5 year monitoring program pinpoints specific problems on an allotment --- then and only then, should current management practices be altered in an attempt to correct the identified problem,

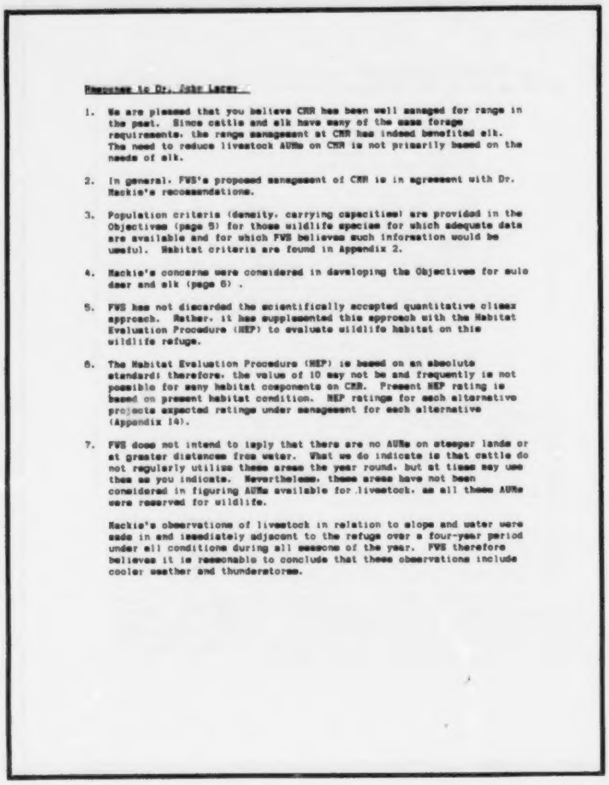
6) the no action alternative is the most feasible management strategy discussed in the DEIS.

I appreciated the opportunity to comment on the DEIS. Please contact me (406-994-5601) if I can assist your future efforts to improve management on the CMR.

Sincerely,

John R. Lacey

Dr. John R. Lacey
Extension Range Specialist
221 Linfield Hall



Response to Dr. John Lacey

1. We are pleased that you believe CMR has been well managed for range in the past. Since cattle and elk have many of the same forage requirements, the range management at CMR has indeed benefited elk. The need to reduce livestock AUMs on CMR is not primarily based on the needs of elk.

2. In general, FWS's proposed management of CMR is in agreement with Dr. Mackie's recommendations.

3. Population criteria (density, carrying capacities) are provided in the Objectives (page 5) for those wildlife species for which adequate data are available and for which FWS believes such information would be useful. Habitat criteria are found in Appendix 2.

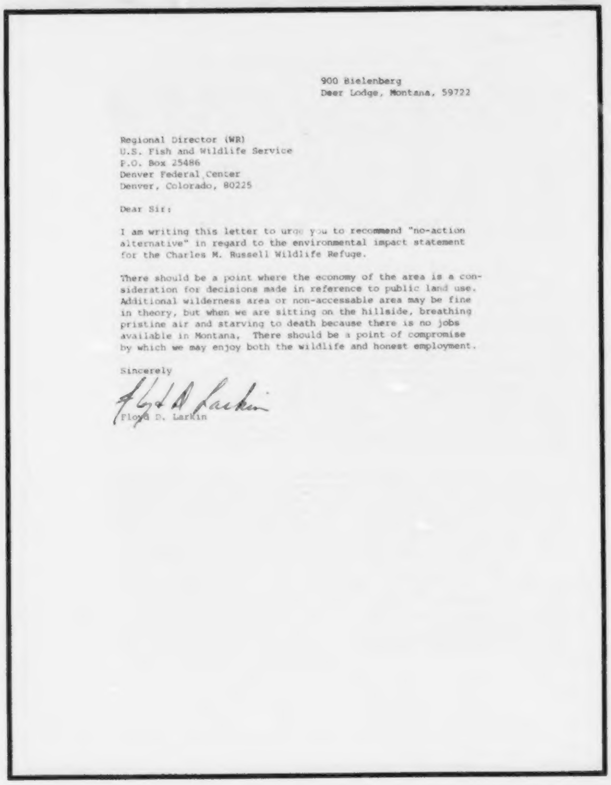
4. Mackie's concerns were considered in developing the Objectives for mule deer and elk (page 6) .

5. FWS has not discarded the scientifically accepted quantitative climax approach. Rather, it has supplemented this approach with the Habitat Evaluation Procedure (HEP) to evaluate wildlife habitat on this wildlife refuge.

6. The Habitat Evaluation Procedure (HEP) is based on an absolute standard; therefore, the value of 10 may not be and frequently is not possible for many habitat components on CMR. Present HEP rating is based on present habitat condition. HEP ratings for each alternative projects expected ratings under management for each alternative (Appendix 14).

7. FWS does not intend to imply that there are no AUMs on steeper lands or at greater distances from water. What we do indicate is that cattle do not regularly utilize these areas the year round, but at times may use them as you indicate. Nevertheless, these areas have not been considered in figuring AUMs available for livestock, as all these AUMs were reserved for wildlife.

   Mackie's observations of livestock in relation to slope and water were made in and immediately adjacent to the refuge over a four-year period under all conditions during all seasons of the year. FWS therefore believes it is reasonable to conclude that these observations include cooler weather and thunderstorms.



900 Bielenberg
Deer Lodge, Montana, 59722

Regional Director (WR)
U.S. Fish and Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, Colorado, 80225

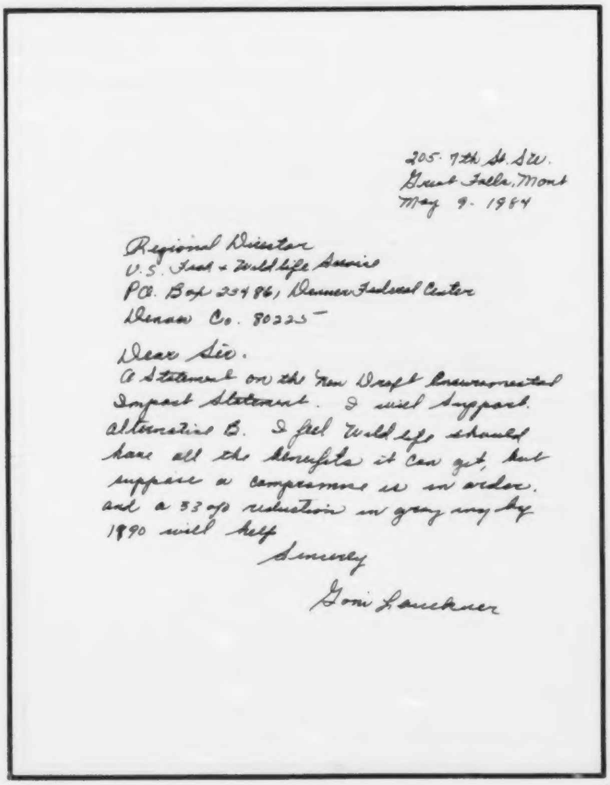
Dear Sir:

I am writing this letter to urge you to recommend "no-action alternative" in regard to the environmental impact statement for the Charles M. Russell Wildlife Refuge.

There should be a point where the economy of the area is a consideration for decisions made in reference to public land use. Additional wilderness area or non-accessable area may be fine in theory, but when we are sitting on the hillside, breathing pristine air and starving to death because there is no jobs available in Montana. There should be a point of compromise by which we may enjoy both the wildlife and honest employment.

Sincerely

Floyd D Larkin
Floyd D. Larkin



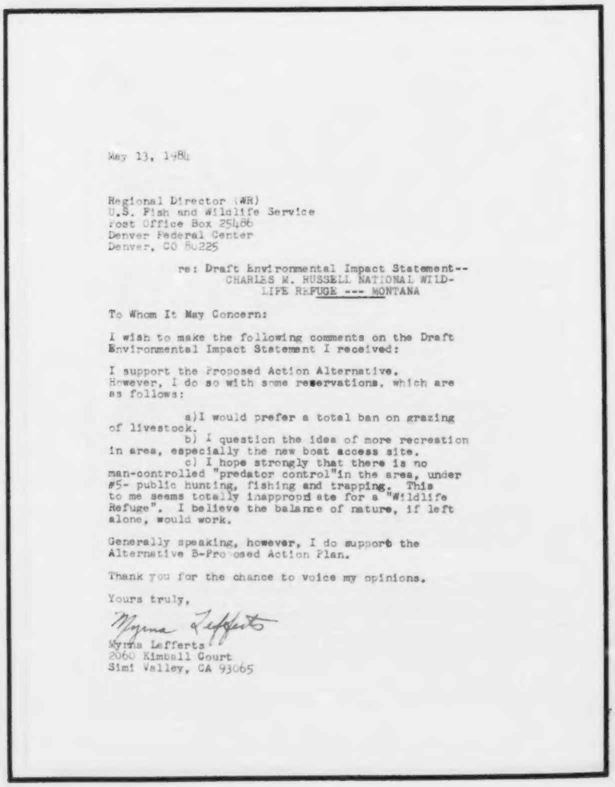
205. 7th St. SW.
Great Falls, Mont
May 9. 1984

Regional Director
U.S. Fish + Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver Co. 80225

Dear Sir.
A Statement on the new Draft Environmental Impact Statement. I will Support Alternative B. I feel Wildlife should have all the benefits it can get, but suppose a compromise is in order. and a 33 o/o reduction in grazing by 1990 will help

Sincerely

Goni Lauckner



May 13, 1984

Regional Director (WR)
U.S. Fish and Wildlife Service
Post Office Box 25486
Denver Federal Center
Denver, CO 80225

re: Draft Environmental Impact Statement--
CHARLES M. RUSSELL NATIONAL WILD-
LIFE REFUGE --- MONTANA

To Whom It May Concern:

I wish to make the following comments on the Draft Environmental Impact Statement I received:

I support the Proposed Action Alternative. However, I do so with some reservations, which are as follows:

a) I would prefer a total ban on grazing of livestock.

b) I question the idea of more recreation in area, especially the new boat access site.

c) I hope strongly that there is no man-controlled "predator control" in the area, under #5- public hunting, fishing and trapping. This to me seems totally inappropriate for a "Wildlife Refuge". I believe the balance of nature, if left alone, would work.

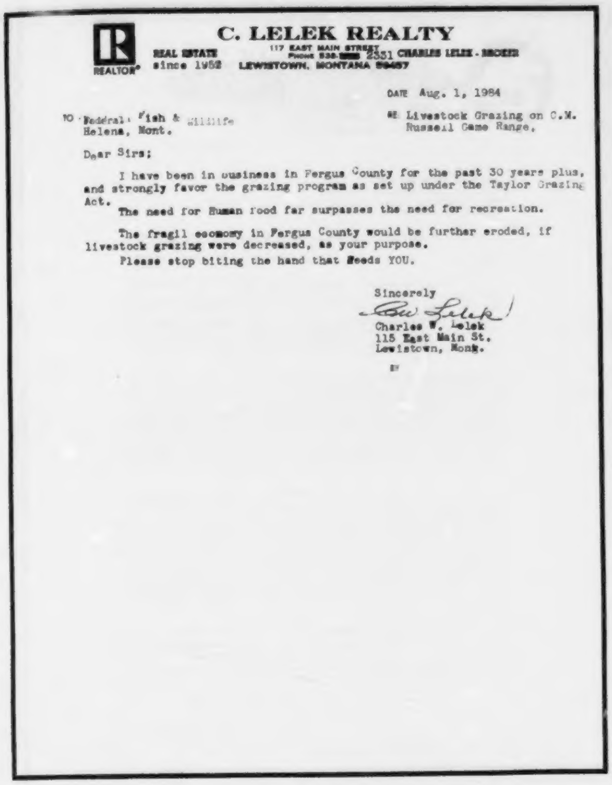
Generally speaking, however, I do support the Alternative B-Proposed Action Plan.

Thank you for the chance to voice my opinions.

Yours truly,

Myrna Lefferts

Myrna Lefferts
2060 Kimball Court
Simi Valley, CA 93065



C. LELEK REALTY
REAL ESTATE since 1952
117 EAST MAIN STREET
PHONE 538-2331
LEWISTOWN, MONTANA 59457
CHARLES LELEK - BROKER
REALTOR®

DATE Aug. 1, 1984

TO Federal Fish & Wildlife
Helena, Mont.

RE Livestock Grazing on C.M.
Russell Game Range,

Dear Sirs;

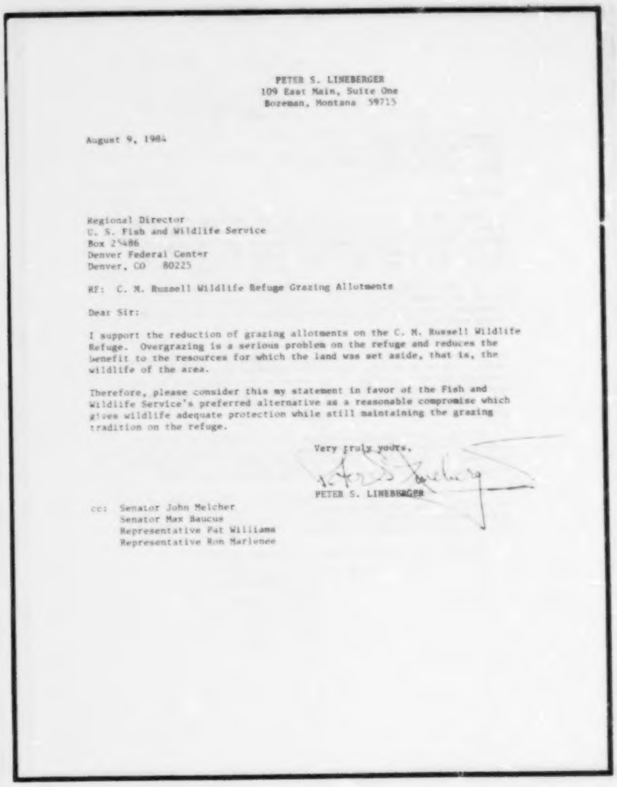
I have been in business in Fergus County for the past 30 years plus, and strongly favor the grazing program as set up under the Taylor Grazing Act.

The need for Human food far surpasses the need for recreation.

The fragil ecomomy in Fergus County would be further eroded, if livestock grazing were decreased, as your purpose.

Please stop biting the hand that feeds YOU.

Sincerely
Chas Lelek
Charles W. Lelek
115 East Main St.
Lewistown, Mont.



PETER S. LINEBERGER
109 East Main, Suite One
Bozeman, Montana 59715

August 9, 1984

Regional Director
U. S. Fish and Wildlife Service
Box 25486
Denver Federal Center
Denver, CO 80225

RE: C. M. Russell Wildlife Refuge Grazing Allotments

Dear Sir:

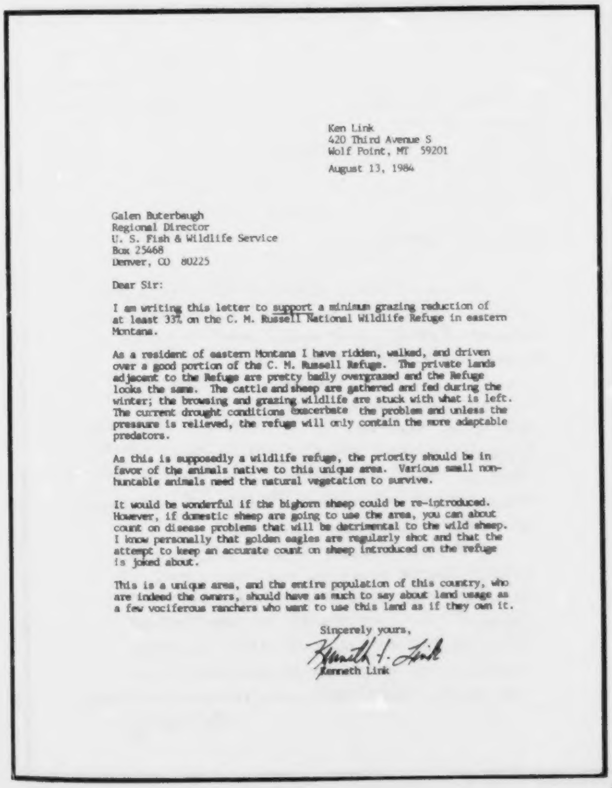
I support the reduction of grazing allotments on the C. M. Russell Wildlife Refuge. Overgrazing is a serious problem on the refuge and reduces the benefit to the resources for which the land was set aside, that is, the wildlife of the area.

Therefore, please consider this my statement in favor of the Fish and Wildlife Service's preferred alternative as a reasonable compromise which gives wildlife adequate protection while still maintaining the grazing tradition on the refuge.

Very truly yours,

PETER S. LINEBERGER

cc: Senator John Melcher
Senator Max Baucus
Representative Pat Williams
Representative Ron Marlenee



Ken Link
420 Third Avenue S
Wolf Point, MT 59201

August 13, 1984

Galen Buterbaugh
Regional Director
U. S. Fish & Wildlife Service
Box 25468
Denver, CO 80225

Dear Sir:

I am writing this letter to support a minimum grazing reduction of at least 33% on the C. M. Russell National Wildlife Refuge in eastern Montana.

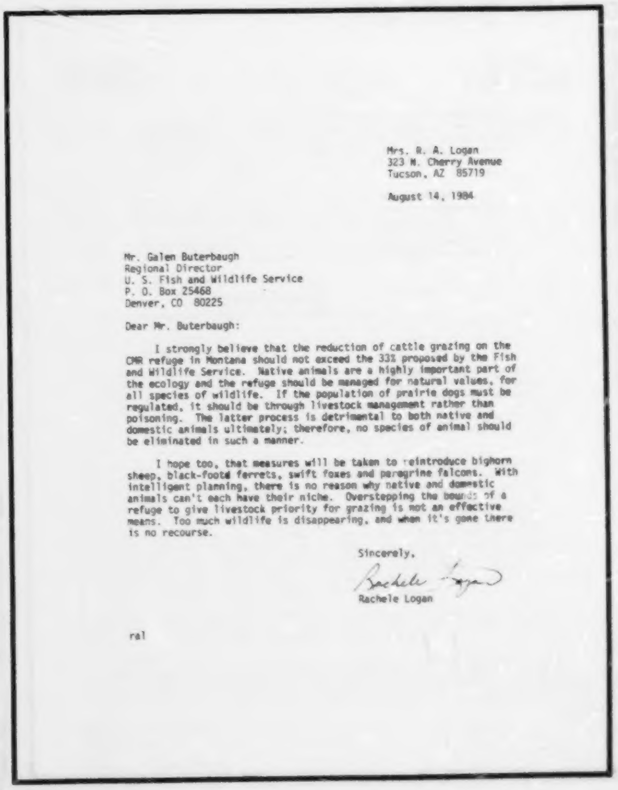
As a resident of eastern Montana I have ridden, walked, and driven over a good portion of the C. M. Russell Refuge. The private lands adjacent to the Refuge are pretty badly overgrazed and the Refuge looks the same. The cattle and sheep are gathered and fed during the winter; the browsing and grazing wildlife are stuck with what is left. The current drought conditions exacerbate the problem and unless the pressure is relieved, the refuge will only contain the more adaptable predators.

As this is supposedly a wildlife refuge, the priority should be in favor of the animals native to this unique area. Various small non-huntable animals need the natural vegetation to survive.

It would be wonderful if the bighorn sheep could be re-introduced. However, if domestic sheep are going to use the area, you can about count on disease problems that will be detrimental to the wild sheep. I know personally that golden eagles are regularly shot and that the attempt to keep an accurate count on sheep introduced on the refuge is joked about.

This is a unique area, and the entire population of this country, who are indeed the owners, should have as much to say about land usage as a few vociferous ranchers who want to use this land as if they own it.

Sincerely yours,
Kenneth L. Link
Kenneth Link



Mrs. R. A. Logan
323 N. Cherry Avenue
Tucson, AZ 85719

August 14, 1984

Mr. Galen Buterbaugh
Regional Director
U. S. Fish and Wildlife Service
P. O. Box 25468
Denver, CO 80225

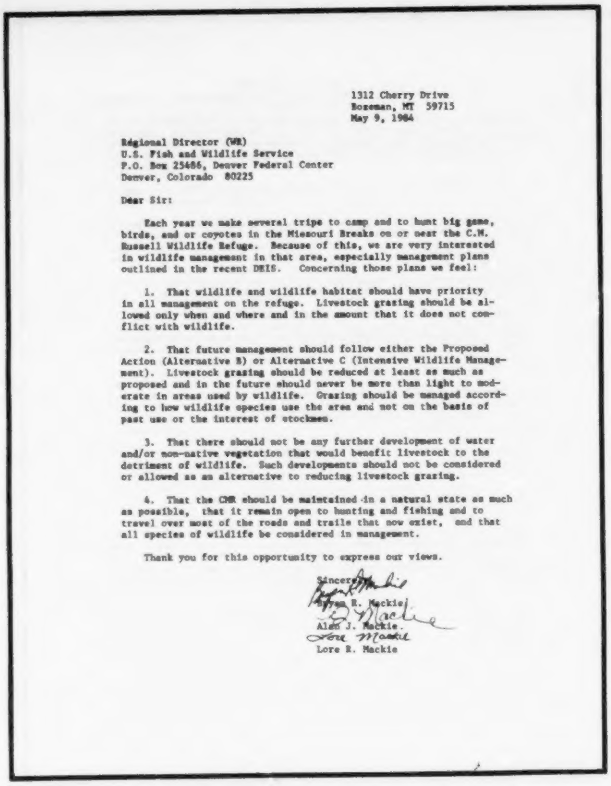
Dear Mr. Buterbaugh:

I strongly believe that the reduction of cattle grazing on the CMR refuge in Montana should not exceed the 33% proposed by the Fish and Wildlife Service. Native animals are a highly important part of the ecology and the refuge should be managed for natural values, for all species of wildlife. If the population of prairie dogs must be regulated, it should be through livestock management rather than poisoning. The latter process is detrimental to both native and domestic animals ultimately; therefore, no species of animal should be eliminated in such a manner.

I hope too, that measures will be taken to reintroduce bighorn sheep, black-footd ferrets, swift foxes and peregrine falcons. With intelligent planning, there is no reason why native and domestic animals can't each have their niche. Overstepping the bounds of a refuge to give livestock priority for grazing is not an effective means. Too much wildlife is disappearing, and when it's gone there is no recourse.

Sincerely,
Rachele Logan
Rachele Logan

ral



1312 Cherry Drive
Bozeman, MT 59715
May 9, 1984

Regional Director (WR)
U.S. Fish and Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, Colorado 80225

Dear Sir:

Each year we make several trips to camp and to hunt big game, birds, and or coyotes in the Missouri Breaks on or near the C.M. Russell Wildlife Refuge. Because of this, we are very interested in wildlife management in that area, especially management plans outlined in the recent DEIS. Concerning those plans we feel:

1. That wildlife and wildlife habitat should have priority in all management on the refuge. Livestock grazing should be allowed only when and where and in the amount that it does not conflict with wildlife.

2. That future management should follow either the Proposed Action (Alternative B) or Alternative C (Intensive Wildlife Management). Livestock grazing should be reduced at least as much as proposed and in the future should never be more than light to moderate in areas used by wildlife. Grazing should be managed according to how wildlife species use the area and not on the basis of past use or the interest of stockmen.

3. That there should not be any further development of water and/or non-native vegetation that would benefit livestock to the detriment of wildlife. Such developments should not be considered or allowed as an alternative to reducing livestock grazing.

4. That the CMR should be maintained in a natural state as much as possible, that it remain open to hunting and fishing and to travel over most of the roads and trails that now exist, and that all species of wildlife be considered in management.

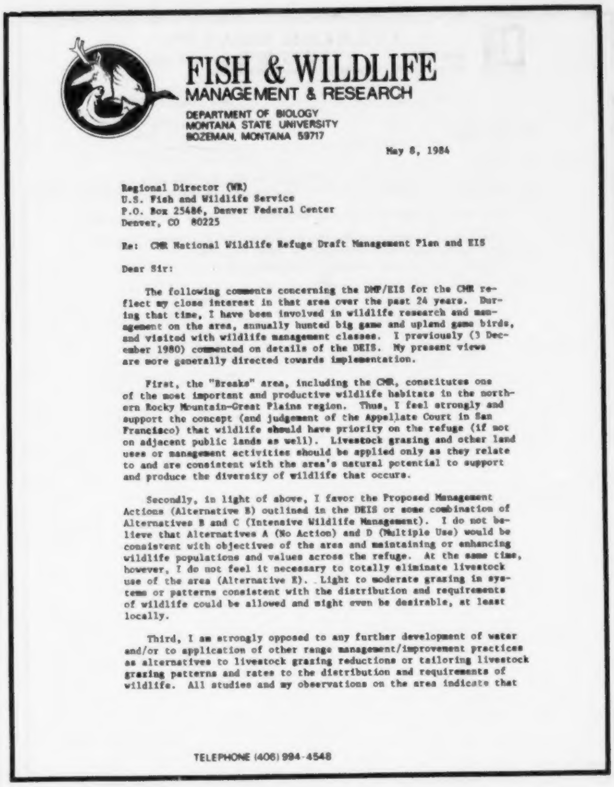
Thank you for this opportunity to express our views.

Sincerely,

Byron R. Mackie

Alan J. Mackie.

Lore Mackie
Lore R. Mackie



FISH & WILDLIFE
MANAGEMENT & RESEARCH

DEPARTMENT OF BIOLOGY
MONTANA STATE UNIVERSITY
BOZEMAN, MONTANA 59717

May 8, 1984

Regional Director (WR)
U.S. Fish and Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, CO 80225

Re: CMR National Wildlife Refuge Draft Management Plan and EIS

Dear Sir:

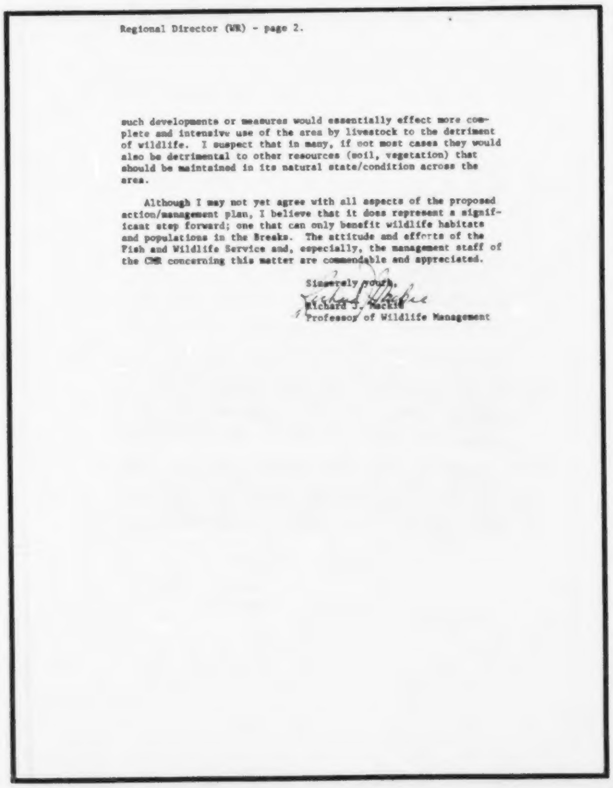
The following comments concerning the DMP/EIS for the CMR reflect my close interest in that area over the past 24 years. During that time, I have been involved in wildlife research and management on the area, annually hunted big game and upland game birds, and visited with wildlife management classes. I previously (3 December 1980) commented on details of the DEIS. My present views are more generally directed towards implementation.

First, the "Breaks" area, including the CMR, constitutes one of the most important and productive wildlife habitats in the northern Rocky Mountain-Great Plains region. Thus, I feel strongly and support the concept (and judgement of the Appellate Court in San Francisco) that wildlife should have priority on the refuge (if not on adjacent public lands as well). Livestock grazing and other land uses or management activities should be applied only as they relate to and are consistent with the area's natural potential to support and produce the diversity of wildlife that occurs.

Secondly, in light of above, I favor the Proposed Management Actions (Alternative B) outlined in the DEIS or some combination of Alternatives B and C (Intensive Wildlife Management). I do not believe that Alternatives A (No Action) and D (Multiple Use) would be consistent with objectives of the area and maintaining or enhancing wildlife populations and values across the refuge. At the same time, however, I do not feel it necessary to totally eliminate livestock use of the area (Alternative E). Light to moderate grazing in systems or patterns consistent with the distribution and requirements of wildlife could be allowed and might even be desirable, at least locally.

Third, I am strongly opposed to any further development of water and/or to application of other range management/improvement practices as alternatives to livestock grazing reductions or tailoring livestock grazing patterns and rates to the distribution and requirements of wildlife. All studies and my observations on the area indicate that

TELEPHONE (406) 994-4548



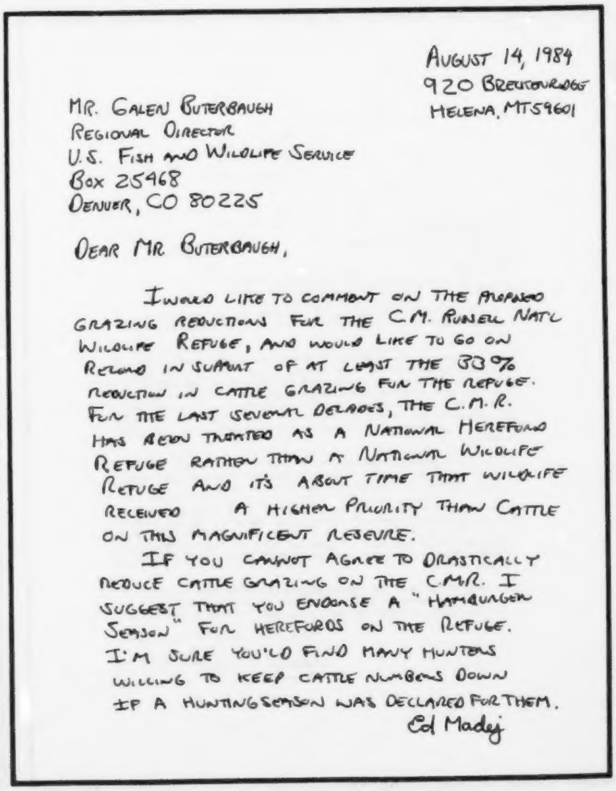
Regional Director (WR) - page 2.

such developments or measures would essentially effect more complete and intensive use of the area by livestock to the detriment of wildlife. I suspect that in many, if not most cases they would also be detrimental to other resources (soil, vegetation) that should be maintained in its natural state/condition across the area.

Although I may not yet agree with all aspects of the proposed action/management plan, I believe that it does represent a significant step forward; one that can only benefit wildlife habitats and populations in the Breaks. The attitude and efforts of the Fish and Wildlife Service and, especially, the management staff of the CMR concerning this matter are commendable and appreciated.

Sincerely yours,

Richard J. Mackie
Professor of Wildlife Management



AUGUST 14, 1984
920 BRECKENRIDGE
HELENA, MT 59601

MR. GALEN BUTERBAUGH
REGIONAL DIRECTOR
U.S. FISH AND WILDLIFE SERVICE
BOX 25468
DENVER, CO 80225

DEAR MR. BUTERBAUGH,

I WOULD LIKE TO COMMENT ON THE PROPOSED GRAZING REDUCTIONS FOR THE C.M. RUSSELL NAT'L WILDLIFE REFUGE, AND WOULD LIKE TO GO ON RECORD IN SUPPORT OF AT LEAST THE 33% REDUCTION IN CATTLE GRAZING FOR THE REFUGE. FOR THE LAST SEVERAL DECADES, THE C.M.R. HAS BEEN TREATED AS A NATIONAL HEREFORD REFUGE RATHER THAN A NATIONAL WILDLIFE REFUGE AND IT'S ABOUT TIME THAT WILDLIFE RECEIVED A HIGHER PRIORITY THAN CATTLE ON THIS MAGNIFICENT RESERVE.

IF YOU CANNOT AGREE TO DRASTICALLY REDUCE CATTLE GRAZING ON THE C.M.R. I SUGGEST THAT YOU ENDORSE A "HAMBURGER SEASON" FOR HEREFORDS ON THE REFUGE. I'M SURE YOU'D FIND MANY HUNTERS WILLING TO KEEP CATTLE NUMBERS DOWN IF A HUNTING SEASON WAS DECLARED FOR THEM.

Ed Madej

max's
Clinic Pharmacy
SMITH CLINIC BUILDING GLASGOW, MONT. 59230

10 August 1984

Galen Buterbaugh, Regional Director
U.S. Fish and Wildlife Service
Box 25468
Denver, Colorado 80255

Dear Mr. Buterbaugh:

I am writing about the matter of the grazing reduction of 33% you propose on the C.M. Russell Wild Life Refuge. I strongly support the grazing reduction and the reintroduction of native wild life.

The large majority of ordinary citizens of Valley County in Montana are primarily interested in the good quality of life found in an unspoiled area. Ranching interests do not employ or support very many of our people. They are, however, quite vocal and do give heavy support to lobbying for their own benefits.

Please resist pressure from special interests and support the long range good for the wild life refuge.

Sincerely,

Max A. Makich

Max A. Makich, President

Copies to
Sen. Max Baucus
Sen. John Melcher

Galen Buterbaugh,

I wanted to let you know how an average citizen feels about cattle grazing on the Charles M Russell Wildlife Refuge and other wildlife areas.

These areas have been set aside for the wildlife of the area. Cattle are not wildlife. Cattle grazing should be greatly reduced in all wildlife refuges.

Thank You,

John Mallander

JOHN MALLANDER
4436 15TH AVE S
MINNEAPOLIS MN 55407

May 3, 1984 WR

Dear Mr Shields,

After reading your Draft Environmental Impact Statement on the CMR, I favor the Alternative C (Intensive Wildlife Management) Plan

In the next century, the exact year I don't know, outdoor recreation will be the leading industry in Montana. Twice I have been a tourist to East Africa (Kenya + Tanzania) and in the future if we plan now, you will see tourists viewing wildlife here in Montana in much greater numbers. As tourists and the local population does now in East Africa

As time goes on there is less and less wildlife habitat in the USA and the world. Alternative C would provide, as I read the plan, more wildlife habitat for the Charles M Russell Wildlife Refuge in Montana

821 Allendale Ct
Helena, Montana
59601

Please think of the future and future generations of Americans when you make your final ~~decision~~ decisions for the CMR Refuge

Thank you,
Joe Maran

MARKLE'S INCORPORATED
P.O. Box 71 - Phone (406) 228-9366
Glasgow, Montana 59230

IMPLEMENT Phone 228-9341 Hwy. 2 East
HARDWARE Phone 228-9367 416 2nd Avenue South
VALUE WAREHOUSE Phone 228-4012 702 1st Avenue South
MOVING & STORAGE Phone 228-9482 On BN Right-Of-Way
OIL CO. Phone 228-4641 236 1st Avenue South

10 August 1984

Regional Director
US Fish and Wildlife Service
Box 25486
Denver Federal Center
Denver, Colorado 80225

Subject: Citizen Comment
DEIS-Charles M. Russell National Wildlife Refuge

Unable to attend the hearing conducted in Glasgow, 31 July 1984, and to articulate my comments on the subject DEIS, this letter is to solicit the Regional Directors attention to my letter and inclusion of the same in the formal records on the same.

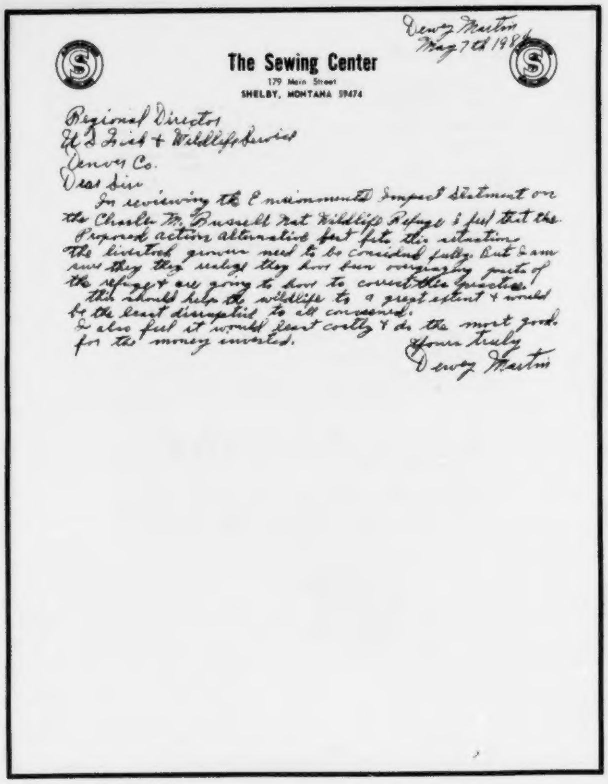
While rational efforts have continued for two decades on the part of landowners on and bordering the Refuge to seek out and cooperate in a balanced approach to resolve environmental and economic considerations, the DEIS as presented and the irresponsible proposal for enhanced wildlife habitat management, combines a potential for continued conflict, serious economic stagnation, and deterioration and eroding of strategic business and recreational units that have become integral to the economic survival of this areas population.

Continuation of the present management program, in my opinion, go far enough in enhancing wildlife habitat. The economy of this area in particular, and more generally at the national level, is fragile and requires attention to alternatives that will result in the least disruption. Grazing cutbacks or agriculture reductions in land, water or access will disrupt traditional use of this land. I do not believe EO 7509, passed in 1936, can be overlooked in any management plan on the Refuge. It provides for improvement of public grazing, and allows equal priority on the Refuge for wildlife and for livestock. While some priority for wildlife was intended, that priority was limited. The presumption often aired that multiple use and wildlife are not compatible is in error. Historical use of the CMR is grounded proof that tended agriculture, recreation, wildlife and private land holdings are compatible.

While a codified multiple use alternative is the best alternative, it is my understanding this can only be accomplished by congressional action. The NO ACTION alternative will best serve all interests for now.

The economic impact of a flexible management program on the Refuge cannot be underemphasized. The unprincipled tenacity with which our Government disrupts life on and bordering the Refuge not only makes planning impossible for landowners and recreationalists, it renders improvements and expansion basically impractical.

ED MARKLE
MARKLE'S INC.
BOX 71
GLASGOW, MONTANA 59230


Dewey Martin
May 7th 1984

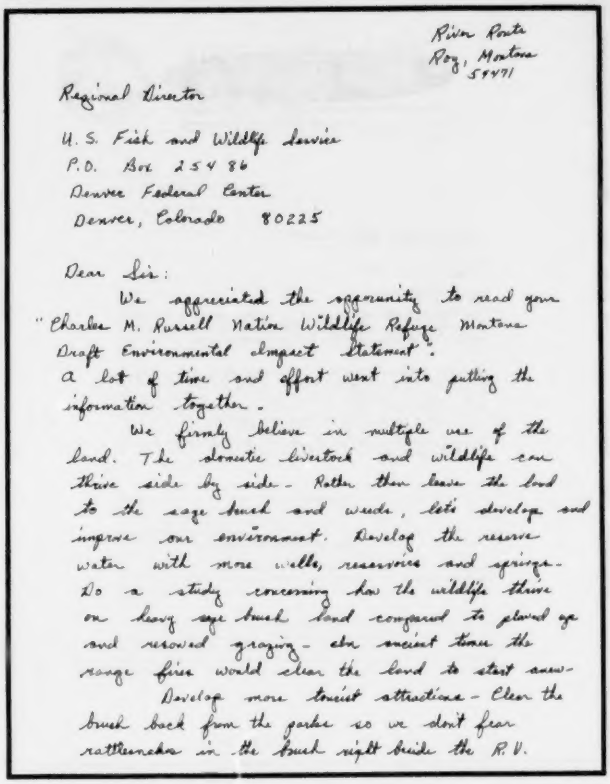
The Sewing Center
179 Main Street
SHELBY, MONTANA 59474

Regional Director
U S Fish & Wildlife Service
Denver Co.

Dear Sir

In reviewing the Environmental Impact Statement on the Charles M. Russell Nat Wildlife Refuge I feel that the Proposed action alternative best fits the situation. The livestock growers need to be considered fully. But I am sure they they realize they have been overgrazing parts of the refuge & are going to have to correct this practice. This should help the wildlife to a great extent & would be the least disruptive to all concerned. I also feel it would least costly & do the most good for the money invested.

Yours truly
Dewey Martin


River Route
Roy, Montana
59471

Regional Director

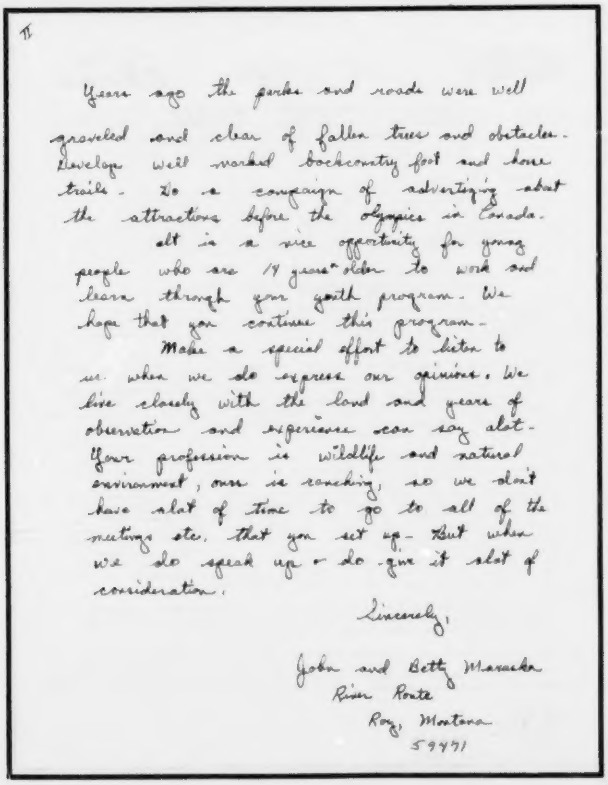
U. S. Fish and Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Sir:

We appreciated the opportunity to read your "Charles M. Russell Nation Wildlife Refuge Montana Draft Environmental Impact Statement". A lot of time and effort went into putting the information together.

We firmly believe in multiple use of the land. The domestic livestock and wildlife can thrive side by side. Rather than leave the land to the sage brush and weeds, let's develop and improve our environment. Develop the reserve water with more wells, reservoirs and springs. Do a study concerning how the wildlife thrive on heavy sage brush land compared to plowed up and reseeded grazing. In ancient times the range fires would clear the land to start anew.

Develop more tourist attractions. Clear the brush back from the parks so we don't fear rattlesnakes in the brush right beside the R.V.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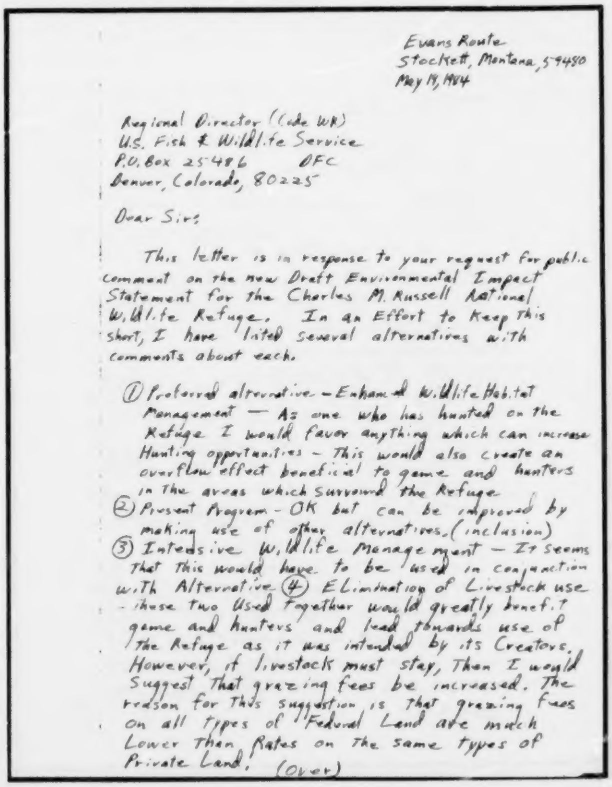
Years ago the parks and roads were well graveled and clear of fallen trees and obstacles. Develop well marked backcountry foot and horse trails. Do a campaign of advertising about the attractions before the olympics in Canada.

It is a nice opportunity for young people who are 14 years & older to work and learn through your youth program. We hope that you continue this program.

Make a special effort to listen to us when we do express our opinions. We live closely with the land and years of observation and experience can say alot. Your profession is wildlife and natural environment, ours is ranching, so we don't have alot of time to go to all of the meetings etc. that you set up. But when we do speak up - do give it alot of consideration.

Sincerely,

John and Betty Maracka
River Route
Roy, Montana
59471


Evans Route
Stockett, Montana, 59480
May 19, 1984

Regional Director (Code WR)
U.S. Fish & Wildlife Service
P.O. Box 25486 DFC
Denver, Colorado, 80225

Dear Sirs;

This letter is in response to your request for public comment on the new Draft Environmental Impact Statement for the Charles M. Russell National Wildlife Refuge. In an Effort to Keep This short, I have listed several alternatives with comments about each.

① Preferred alternative - Enhanced Wildlife Habitat Management — As one who has hunted on the Refuge I would favor anything which can increase Hunting opportunities - This would also create an overflow effect beneficial to game and hunters in The areas which surround the Refuge
② Present Program - OK but can be improved by making use of other alternatives. (inclusion)
③ Intensive Wildlife Management — It seems That This would have to be used in conjunction with Alternative ④ Elimination of Livestock use - these two Used together would greatly benefit game and hunters and lead towards use of The Refuge as it was intended by its Creators. However, if livestock must stay, Then I would Suggest That grazing fees be increased. The reason for This suggestion is That grazing fees on all types of Federal Land are much Lower Than Rates on The same types of Private Land. (Over)

⑤ Multiple Use – Would be acceptable if Strong Restrictions were Placed upon the following activities: Mining, Oil Exploration, Motorcycles, Aircraft, and Snowmobiles.

In conclusion I would like to stress the Idea that the CMR Refuge was Created for Wildlife and Wildlife related activities, and that this should be a major consideration throughout the decision making process.

Thank you very much for the opportunity to comment!

Sincerely,
Steve Mayernik Jr.

McKeever Land & Cattle Co., Inc.
Phone 406/557-6153
Box 55
BRUSETT, MONTANA 59318

August 1, 1984

Regional Director
U.S. Fish & Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, Co. 80225

I support the "No Action" management plan of the CMR.

The recommendation by the FWS to cut grazing allotments would put many ranchers out of business and make border-line operators out of many other ranchers.

Putting limitations on grazing would hurt the economy of the counties affected by eliminating jobs and eroding the tax base.

Further limitations on the wildlife refuge will close the area for public use.

I also make a proposal that it should be required that any refuge Manager should be a native of Montana, having an Agricultural background, and at least 1/2 of the employees on the game range be natives of the state also, with an Agricultural background.

Mrs. Frank McKeever
Brusett, Mt.

McKeever Land & Cattle Co., Inc.
Phone 406/557-6153
Box 55
BRUSETT, MONTANA 59318

August 1, 1984

Regional Director
US Fish & Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, Co. 80225

Dear Sir:

I have reviewed the recent Charles M. Russell National Wildlife Refuge Draft Environmental Impact Statement and must say it is a great piece of work.

It is well done, well bound, well presented. Exceptional ! The work shows many, many man days of professional help. Millions of miles of travel and days and days of research by Government staff. The printing and distribution alone must have cost the taxpayers millions. Well done !

It shows what can be done with unlimited funds and resources to produce a document that would influence public opinion in a certain way. I realise that in a few years all livestock will likely be removed from the CMR even though when Lewis & Clark came up the Missouri River in the early 1800's they saw many thousands of buffalo along the banks of the river. The buffalo would have about the same effect on range land as cattle. The buffalo even makes the same kind of pile of manure for the fastidious city dweller to step in. They also have the same type of feet so the trampling of erodable soil and vegetation would be similar to that of cattle

As far as wildlife is concerned there will never be any large numbers in the CMR because it is not a hospitable area. The wildlife will always tend to go out where the private land owner operates because he will be sustaining an environment that is as comfortable as possible for his livestock so he can make a profit on his operation .

McKeever Land & Cattle Co., Inc.
Phone 406/557-6153
Box 55
BRUSETT, MONTANA 59318

2

And the wildlife, all of them; because one will follow the other and will tend to go where there is someone who understands their needs.

As long as the Soil Conservation Service and the Ranchers and Farmers can stay in business in Eastern Montana there will always be large numbers of wildlife there in spite of all the game managers, biologists, bureaucrats, politicians, etc. from those 13 original states and Texas that have no government land--only State land.

My recommendation on the CMR Draft EIS is No Action.

Respectfully submitted:
F.S. McKeever
F.S. McKeever
Brusett, Montana

cc: John Melcher
Ron Marlenee

August 7, 1984

Robert Shields, Regional Director
Denver Federal Center
Denver, Colorado 80200

Re: Management of Charles M. Russell National Wildlife Refuge

Dear Mr. Shields:

I have read through your new Impact Statement and am writing this paper in response. The statement offers no change in regard to our, the Big Dry, unit so I am supporting the No Action Alternative. I see no need for Congressional action to implement the Multiple Use Alternative as your statement indicates; it would be my alternative choice.

You still want to eliminate sheep grazing as they are supposed to compete with the Pronghorn for vegetation. I don't believe the pronghorn habitat is as depressed as the statement says. Most of the shrubs and other vegetation they winter on are on lands other than the CMR. The game refuge is a narrow strip, 1/4 mile up to one mile in width on our unit. Antelope are on it some but in recent surveys by the Fish, Wildlife and Parks, 89% of the sightings were on lands other than the refuge.

In regard to the cutting of livestock animal units, I don't think that is necessary either. If some control of Prairie Dogs were done, the allotment would have good to excellent vegetation. At the time of the EIS survey of the refuge it was 85% good to excellent and your surveyor stated the only place in the fair category was dog towns.

The grazing allotment of each unit should be considered separately. The allotment cuts should not be permanent. Weather, fires, grasshoppers and noxious weeds have a large impact on vegetation. Each unit's allotment could be considered and either enlarged or reduced in AUM's each year before the next year's lease. 1

If predatory animals had been controlled, I am sure your primary species of 400,000 sharp tailed grouse and 1,500 antelope would be more than established on the C.M.R.

In conclusion, I support Alternative A (No Action) and the Multiple Use is my alternative.

Yours truly,

John McKerlick

John McKerlick

John McKerlick
Jordan, Montana 59337

JM/jb

Response to John McKerlick

1. Appendix 5 gives the livestock AUM stocking rate by allotment under each alternative. Detailed habitat management plans will be developed and implemented for each allotment after the FEIS and Record of Decision. Rather than changing the number of allowable AUMs each year, based on weather, insects, etc., the Fish & Wildlife Service would prefer to work with involved grazing permittees on plans that permit greater stability for the livestock operator.

27655 Frontage Road
Bozeman, Montana 59715
May 31, 1984

Regional Director
U.S. Fish & Wildlife Service
Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Sir:

This is in response to the proposed Management Plan and Environmental Impact Statement for the Charles M. Russell National Wildlife Refuge in north central Montana.

I support the U.S. Fish and Wildlife Service in their preferred alternative. Since this Refuge was established to accommodate wildlife, there should be no question but that deteriorated range should be allowed to recover, even at the expense of livestock grazing.

This Refuge was established to provide habitat for some of Montana's varied species of wildlife. It was never intended that the area should offer unlimited, subsidized forage to nearby livestock operators, nor was it or its managers expected to be political pawns for either State or National Legislators, in spite of recent political shenanigans going on in eastern Montana. The time has come for wildlife to receive its fair shake on the CMR, as original legislation intended.

Please make these comments a part of the official record.

Sincerely,

Harry McNeal

Harry McNeal, Chairman
Montana Wildlife Fund

CC: Max Baucus
John Melcher
Ron Marlenee

MERIDIAN LAND & MINERAL COMPANY

Norwest Center
Post Office Box 1779
Billings, MT 59103-1779
406 256-4500

May 22, 1984

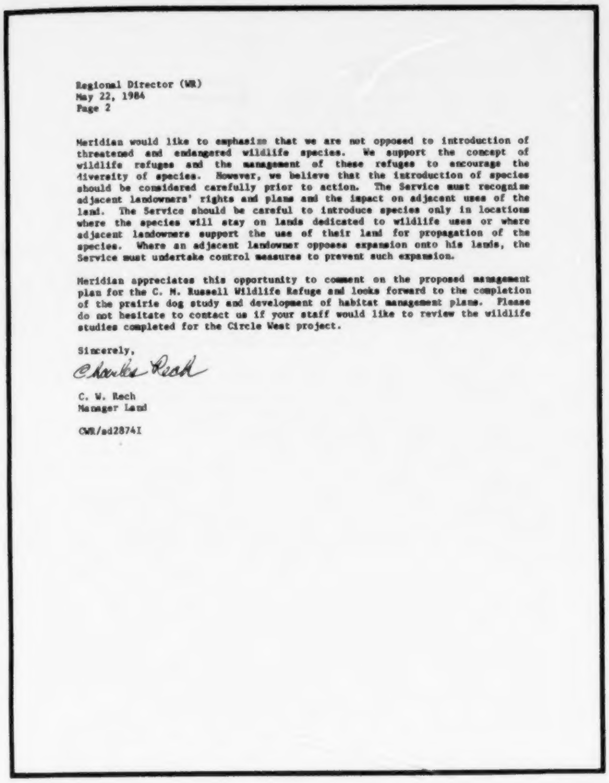
Regional Director (WR)
U.S. Fish and Wildlife Service
P. O. Box 25486, Denver Federal Center
Denver, Colorado 80225

Dear Sir:

We recently received the new draft Environmental Impact Statement on management of the Charles M. Russell National Wildlife Refuge in Montana. Even though we received this DEIS after the May 15 deadline for comment, we would like to register our concern regarding one element of the proposed management plan for the Refuge. We would also like to request that our name be placed on the mailing list for future actions regarding the C. M. Russell Wildlife Refuge and in particular, for the habitat management plans involving introduction of black-footed ferrets on the south side of the Missouri River adjacent to the Big Arm.

Meridian Land & Mineral Company is a subsidiary of Burlington Northern Inc. and manages the parent company's mineral resources, exclusive of oil and gas. In particular, Meridian manages large coal reserves immediately adjacent to the southeastern border of the Big Arm portion of the C. M. R. Wildlife Refuge. Meridian has attempted over the years to identify mineral resources for development in an environmentally sensitive manner in order to minimize resource conflicts to the extent possible. During the 1960's, our company identified a potential mining unit near Nelson Creek for development and has recently completed a coal exchange with the Bureau of Land Management in order to consolidate mineral ownership for both parties in the deposit. This deposit is known as the Circle West coal deposit.

In reading your proposed action in the draft EIS, we became very concerned about your proposal to introduce peregrine falcons and black-footed ferrets on the Refuge. If you introduce these species on the portion of the Refuge immediately adjacent to our lands, then you would negate all of our planning efforts to develop our lands in an environmentally sensitive manner. In addition, Meridian runs the risk of potentially impacting these species either directly because the species expanded their range onto our lands or indirectly because the species would be located adjacent to our project. In the 1960's when we began consideration of a development at Circle West, there were no known threatened or endangered species in or near the project area. It would be very distressing to have threatened and endangered species introduced now or in the future as we are finally able to achieve development.



Regional Director (WR)
May 22, 1984
Page 2

Meridian would like to emphasize that we are not opposed to introduction of threatened and endangered wildlife species. We support the concept of wildlife refuges and the management of these refuges to encourage the diversity of species. However, we believe that the introduction of species should be considered carefully prior to action. The Service must recognize adjacent landowners' rights and plans and the impact on adjacent uses of the land. The Service should be careful to introduce species only in locations where the species will stay on lands dedicated to wildlife uses or where adjacent landowners support the use of their land for propagation of the species. Where an adjacent landowner opposes expansion onto his lands, the Service must undertake control measures to prevent such expansion.

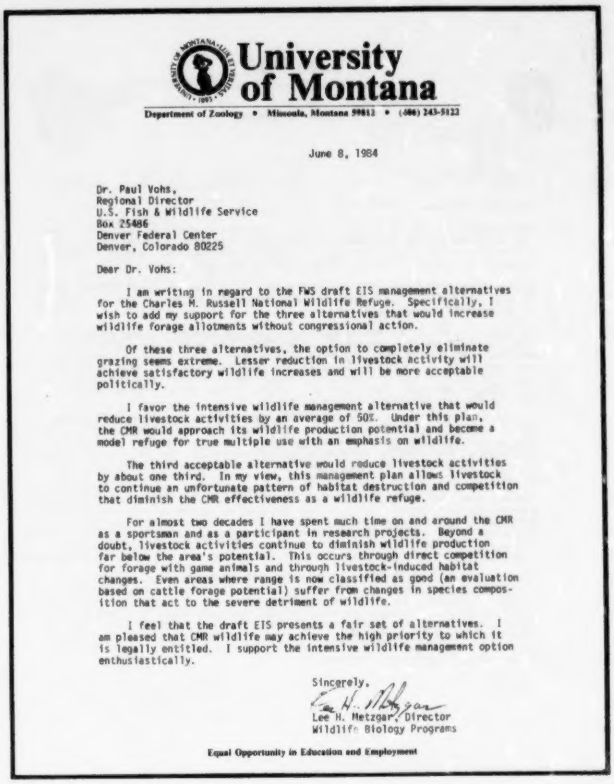
Meridian appreciates this opportunity to comment on the proposed management plan for the C. M. Russell Wildlife Refuge and looks forward to the completion of the prairie dog study and development of habitat management plans. Please do not hesitate to contact us if your staff would like to review the wildlife studies completed for the Circle West project.

Sincerely,

Charles Rech

C. W. Rech
Manager Land

CWR/ad2874I



University of Montana
Department of Zoology • Missoula, Montana 59812 • (406) 243-5122

June 8, 1984

Dr. Paul Vohs,
Regional Director
U.S. Fish & Wildlife Service
Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Dr. Vohs:

I am writing in regard to the FWS draft EIS management alternatives for the Charles M. Russell National Wildlife Refuge. Specifically, I wish to add my support for the three alternatives that would increase wildlife forage allotments without congressional action.

Of these three alternatives, the option to completely eliminate grazing seems extreme. Lesser reduction in livestock activity will achieve satisfactory wildlife increases and will be more acceptable politically.

I favor the intensive wildlife management alternative that would reduce livestock activities by an average of 50%. Under this plan, the CMR would approach its wildlife production potential and become a model refuge for true multiple use with an emphasis on wildlife.

The third acceptable alternative would reduce livestock activities by about one third. In my view, this management plan allows livestock to continue an unfortunate pattern of habitat destruction and competition that diminish the CMR effectiveness as a wildlife refuge.

For almost two decades I have spent much time on and around the CMR as a sportsman and as a participant in research projects. Beyond a doubt, livestock activities continue to diminish wildlife production far below the area's potential. This occurs through direct competition for forage with game animals and through livestock-induced habitat changes. Even areas where range is now classified as good (an evaluation based on cattle forage potential) suffer from changes in species composition that act to the severe detriment of wildlife.

I feel that the draft EIS presents a fair set of alternatives. I am pleased that CMR wildlife may achieve the high priority to which it is legally entitled. I support the intensive wildlife management option enthusiastically.

Sincerely,

Lee H. Metzgar

Lee H. Metzgar, Director
Wildlife Biology Programs

Equal Opportunity in Education and Employment

---

740 S. 14th St.
WORLAND, WYOMING 82401
11 MAY, 1984

REGIONAL DIRECTOR
U. S. FISH AND WILDLIFE SERVICE
P.O. BOX 25486
DENVER FEDERAL CENTER
DENVER, COLORADO 80225

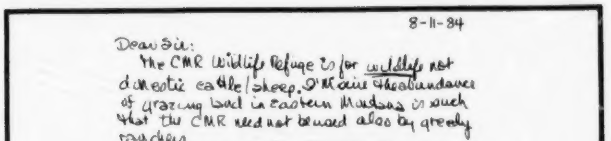
DEAR SIR:

I WOULD LIKE TO TAKE THIS OPPORTUNITY TO VOICE MY STRONG SUPPORT FOR THE NO GRAZING ALTERNATIVE, ALTERNATIVE E, AMONG YOUR OPTIONS FOR FUTURE MANAGEMENT OF CMR. GRAZING USE OF WILDLIFE REFUGES SEEMS TO ME TO BE INCONSISTENT WITH THE PURPOSE OF REFUGES. I FAVOR THE PHASING OUT OF ALL LIVESTOCK USE BY THE YEAR 2000. THE ECONOMIC BURDEN PLACED ON A FEW LIVESTOCK OPERATORS BY SUCH MANAGEMENT WOULD BE OFFSET, I BELIEVE, BY THE VISITATION AND RECREATION A BETTER MANAGED REFUGE WOULD ATTRACT.
THE GOAL OF ANY MANAGEMENT DECISION ON PUBLIC LANDS OUGHT TO BE FOR THE COMMON GOOD. THE WELFARE OF LOCAL RANCHERS, WHILE OF IMMENSE IMPORTANCE TO THEMSELVES, DOES NOT WHOLY CONSTITUTE THE COMMON GOOD IN THIS CASE.
I THEREFORE URGE YOU TO ADOPT THE NO GRAZING ALTERNATIVE ON CMR.

SINCERELY,

Paul J. Meyer

PLEASE INFORM ME OF YOUR DECISION. THANK YOU.



8-11-84

Dear Sir:

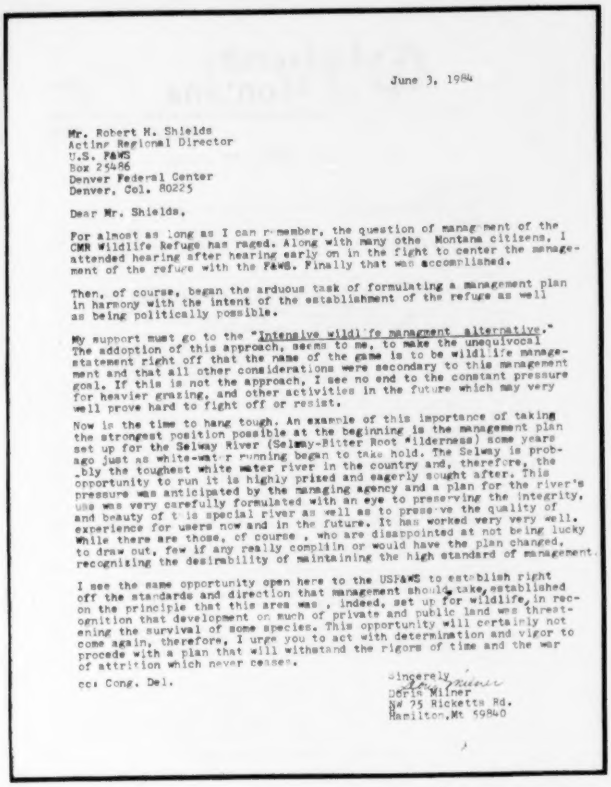
The CMR Wildlife Refuge is for wildlife not domestic cattle/sheep. I realize the abundance of grazing land in eastern Montana is such that the CMR need not be used also by greedy ranchers.

Please adopt Alternative B of the Environmental Impact Statement as the management plan for CMR Wildlife Refuge & that the federal government be allowed to buy up all inholdings & allow no sub leasing for grazing.

Thank you.

gail miller

cc: Senators & congressmen



June 3, 1984

Mr. Robert H. Shields
Acting Regional Director
U.S. F&WS
Box 25486
Denver Federal Center
Denver, Col. 80225

Dear Mr. Shields,

For almost as long as I can remember, the question of management of the CMR Wildlife Refuge has raged. Along with many othe Montana citizens, I attended hearing after hearing early on in the fight to center the management of the refuge with the F&WS. Finally that was accomplished.

Then, of course, began the arduous task of formulating a management plan in harmony with the intent of the establishment of the refuge as well as being politically possible.

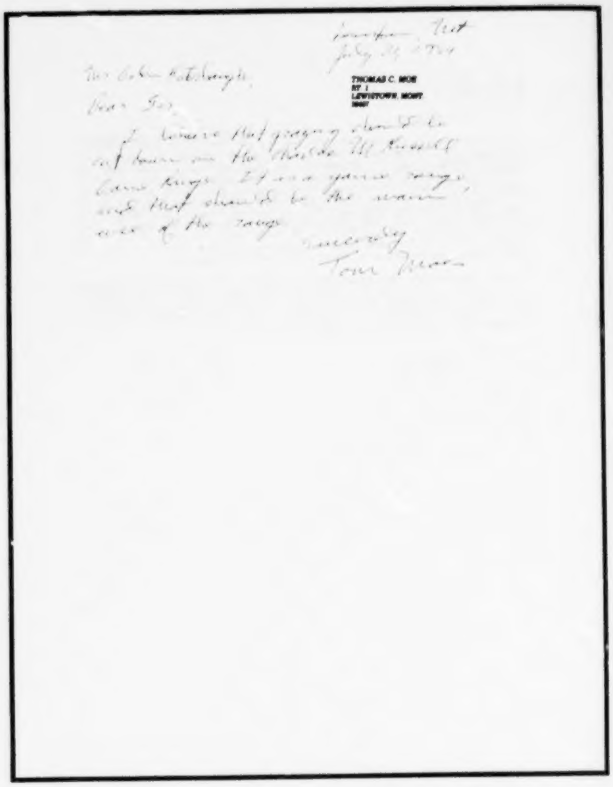
My support must go to the "Intensive wildlife managment alternative." The addoption of this approach, seems to me, to make the unequivocal statement right off that the name of the game is to be wildlife management and that all other considerations were secondary to this management goal. If this is not the approach, I see no end to the constant pressure for heavier grazing, and other activities in the future which may very well prove hard to fight off or resist.

Now is the time to hang tough. An example of this importance of taking the strongest position possible at the beginning is the management plan set up for the Selway River (Selway-Bitter Root Wilderness) some years ago just as white-water running began to take hold. The Selway is probably the toughest white water river in the country and, therefore, the opportunity to run it is highly prized and eagerly sought after. This pressure was anticipated by the managing agency and a plan for the river's use was very carefully formulated with an eye to preserving the integrity, and beauty of this special river as well as to preserve the quality of experience for users now and in the future. It has worked very very well. While there are those, of course , who are disappointed at not being lucky to draw out, few if any really complain or would have the plan changed, recognizing the desirability of maintaining the high standard of management.

I see the same opportunity open here to the USF&WS to establish right off the standards and direction that management should take, established on the principle that this area was , indeed, set up for wildlife, in recognition that development on much of private and public land was threatening the survival of some species. This opportunity will certainly not come again, therefore, I urge you to act with determination and vigor to procede with a plan that will withstand the rigors of time and the war of attrition which never ceases.

cc: Cong. Del.

Sincerely
Doris Milner
Doris Milner
NW 75 Ricketts Rd.
Hamilton,Mt 59840



Lewistown Mont
July 24 1984

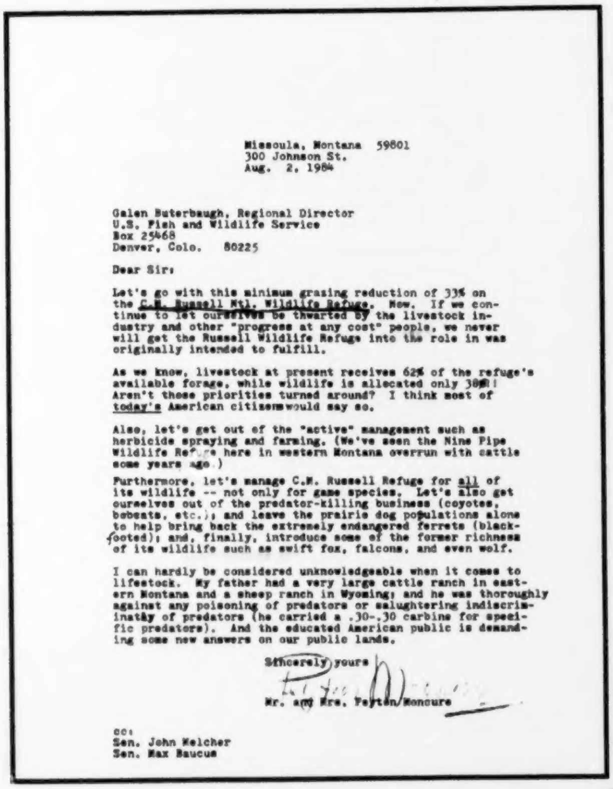
THOMAS C. MOE
RT. 1
LEWISTOWN, MONT
[illegible]

Mr Galen Buterbaugh,

Dear Sir,

I believe that grazing should be cut down on the Charles M Russell Game Range. It is a game range, and that should be the main use of the range.

Sincerely
Tom Moe



Missoula, Montana 59801
300 Johnson St.
Aug. 2, 1984

Galen Buterbaugh, Regional Director
U.S. Fish and Wildlife Service
Box 25468
Denver, Colo. 80225

Dear Sir:

Let's go with this minimum grazing reduction of 33% on the C.M. Russell Ntl. Wildlife Refuge. Now. If we continue to let ourselves be thwarted by the livestock industry and other "progress at any cost" people, we never will get the Russell Wildlife Refuge into the role in was originally intended to fulfill.

As we know, livestock at present receives 62% of the refuge's available forage, while wildlife is allocated only 38%! Aren't these priorities turned around? I think most of today's American citizens would say so.

Also, let's get out of the "active" management such as herbicide spraying and farming. (We've seen the Nine Pipe Wildlife Refuge here in western Montana overrun with cattle some years ago.)

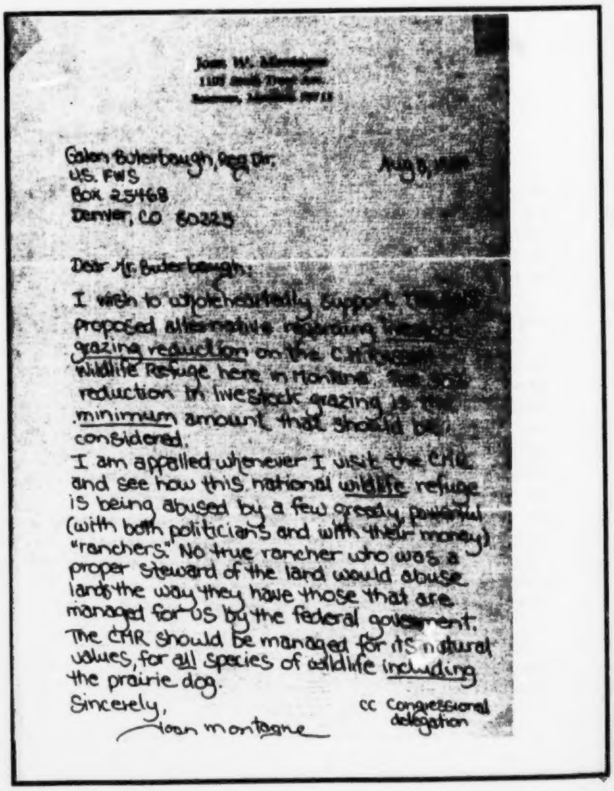
Furthermore, let's manage C.M. Russell Refuge for all of its wildlife -- not only for game species. Let's also get ourselves out of the predator-killing business (coyotes, bobcats, etc.); and leave the prairie dog populations alone to help bring back the extremely endangered ferrets (black-footed); and, finally, introduce some of the former richness of its wildlife such as swift fox, falcons, and even wolf.

I can hardly be considered unknowledgeable when it comes to lifestock. My father had a very large cattle ranch in eastern Montana and a sheep ranch in Wyoming; and he was thoroughly against any poisoning of predators or salughtering indiscriminatly of predators (he carried a .30-.30 carbine for specific predators). And the educated American public is demanding some new answers on our public lands.

Sincerely yours

Mr. and Mrs. Peyton Moncure

cc:
Sen. John Melcher
Sen. Max Baucus



[illegible]
[illegible]
[illegible]

Galen Buterbaugh, Reg Dir.
U.S. FWS
Box 25468
Denver, CO 80225

Aug 8, [illegible]

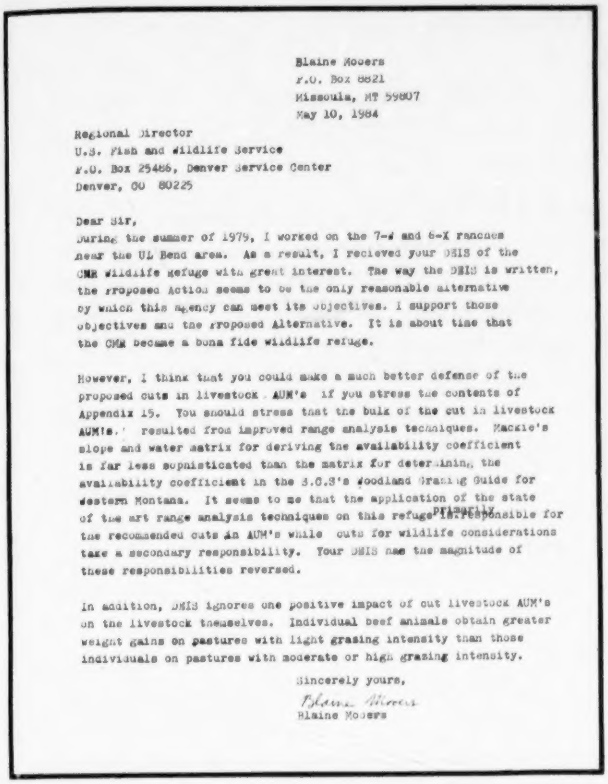
Dear Mr. Buterbaugh:

I wish to wholeheartedly support [illegible] proposed alternative regarding [illegible] grazing reduction on the C.M. [illegible] Wildlife Refuge here in Montana. [illegible] reduction in livestock grazing is [illegible] minimum amount that should be considered.

I am appalled whenever I visit the CMR and see how this national wildlife refuge is being abused by a few greedy, powerful (with both politicians and with their money) "ranchers." No true rancher who was a proper steward of the land would abuse lands the way they have those that are managed for us by the federal government. The CMR should be managed for its natural values, for all species of wildlife including the prairie dog.

Sincerely,
Joan Montagne

cc Congressional delegation



Blaine Mooers
P.O. Box 8821
Missoula, MT 59807
May 10, 1984

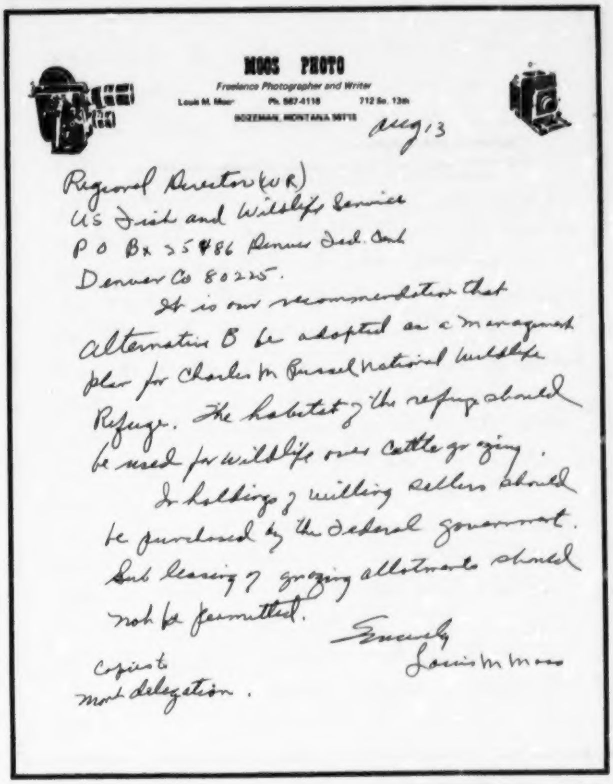
Regional Director
U.S. Fish and Wildlife Service
P.O. Box 25486, Denver Service Center
Denver, CO 80225

Dear Sir,
During the summer of 1979, I worked on the 7-W and 6-X ranches near the UL Bend area. As a result, I recieved your DEIS of the CMR Wildlife Refuge with great interest. The way the DEIS is written, the Proposed Action seems to be the only reasonable alternative by which this agency can meet its objectives. I support those objectives and the Proposed Alternative. It is about time that the CMR became a bona fide wildlife refuge.

However, I think that you could make a much better defense of the proposed cuts in livestock AUM's if you stress the contents of Appendix 15. You should stress that the bulk of the cut in livestock AUM's resulted from improved range analysis techniques. Mackie's slope and water matrix for deriving the availability coefficient is far less sophisticated than the matrix for determining the availability coefficient in the S.C.S's Woodland Grazing Guide for Western Montana. It seems to me that the application of the state of the art range analysis techniques on this refuge is primarily responsible for the recommended cuts in AUM's while cuts for wildlife considerations take a secondary responsibility. Your DEIS has the magnitude of these responsibilities reversed.

In addition, DEIS ignores one positive impact of cut livestock AUM's on the livestock themselves. Individual beef animals obtain greater weight gains on pastures with light grazing intensity than those individuals on pastures with moderate or high grazing intensity.

Sincerely yours,
Blaine Mooers
Blaine Mooers



MOOS PHOTO
Freelance Photographer and Writer
Louis M. Moos Ph. 587-4118 712 So. 13th
BOZEMAN, MONTANA 59715

Aug 13

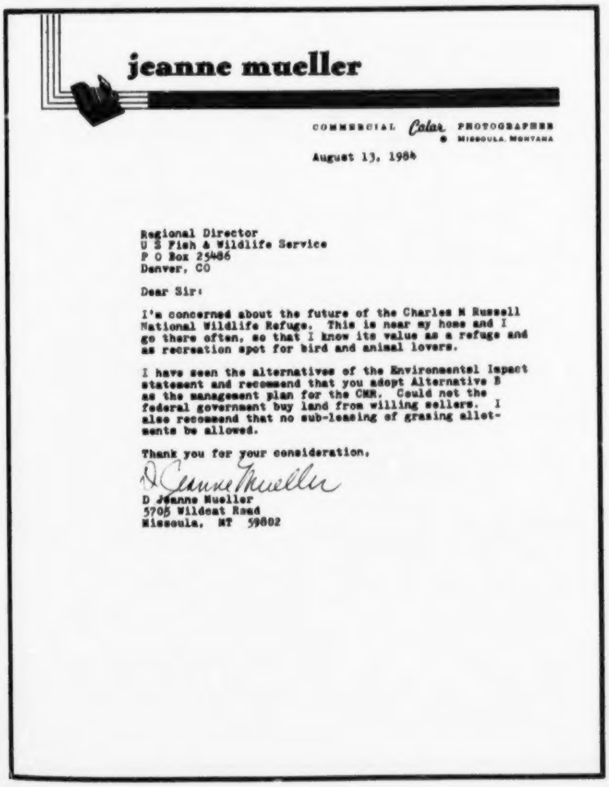
Regional Director (WR)
US Fish and Wildlife Service
P O Bx 25486 Denver Fed. Cent
Denver Co 80225.

It is our recommendation that Alternative B be adopted as a management plan for Charles M Russel National Wildlife Refuge. The habitat of the refuge should be used for wildlife over cattle grazing.

In holdings of willing sellers should be purchased by the federal government. Sub leasing of grazing allotments should not be permitted.

Sincerely
Louis M Moos

copies to
Mont delegation.



jeanne mueller

COMMERCIAL Color PHOTOGRAPHER
• MISSOULA, MONTANA

August 13, 1984

Regional Director
U S Fish & Wildlife Service
P O Box 25486
Denver, CO

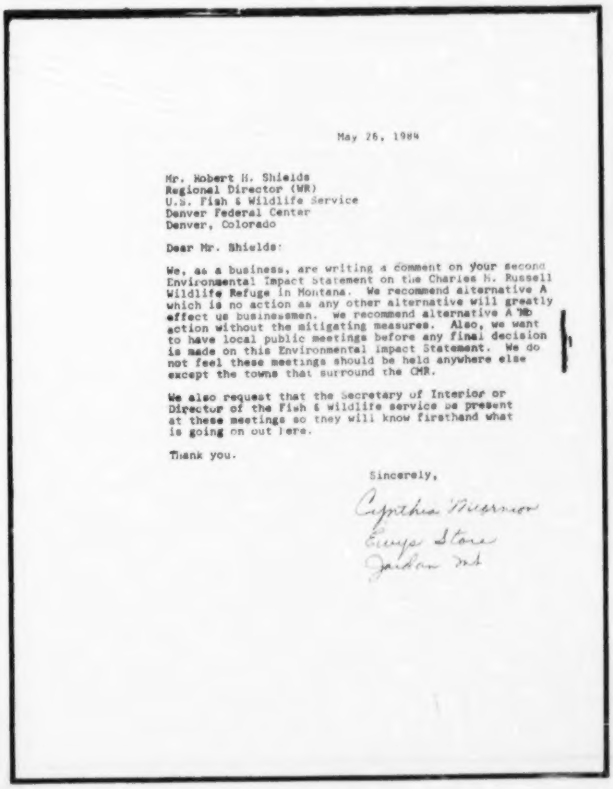
Dear Sir:

I'm concerned about the future of the Charles M Russell National Wildlife Refuge. This is near my home and I go there often, so that I know its value as a refuge and as recreation spot for bird and animal lovers.

I have seen the alternatives of the Environmentel Impact statement and recommend that you adopt Alternative B as the management plan for the CMR. Could not the federal government buy land from willing sellers. I also recommend that no sub-leasing of grazing allotments be allowed.

Thank you for your consideration.

D Jeanne Mueller
D Jeanne Mueller
5705 Wildcat Road
Missoula, MT 59802



May 26, 1984

Mr. Robert H. Shields
Regional Director (WR)
U.S. Fish & Wildlife Service
Denver Federal Center
Denver, Colorado

Dear Mr. Shields:

We, as a business, are writing a comment on your second Environmental Impact Statement on the Charles M. Russell Wildlife Refuge in Montana. We recommend alternative A which is no action as any other alternative will greatly effect us businessmen. we recommend alternative A No action without the mitigating measures. Also, we want to have local public meetings before any final decision is made on this Environmental Impact Statement. We do not feel these meetings should be held anywhere else except the towns that surround the CMR.

We also request that the Secretary of Interior or Director of the Fish & wildlife service be present at these meetings so they will know firsthand what is going on out here.

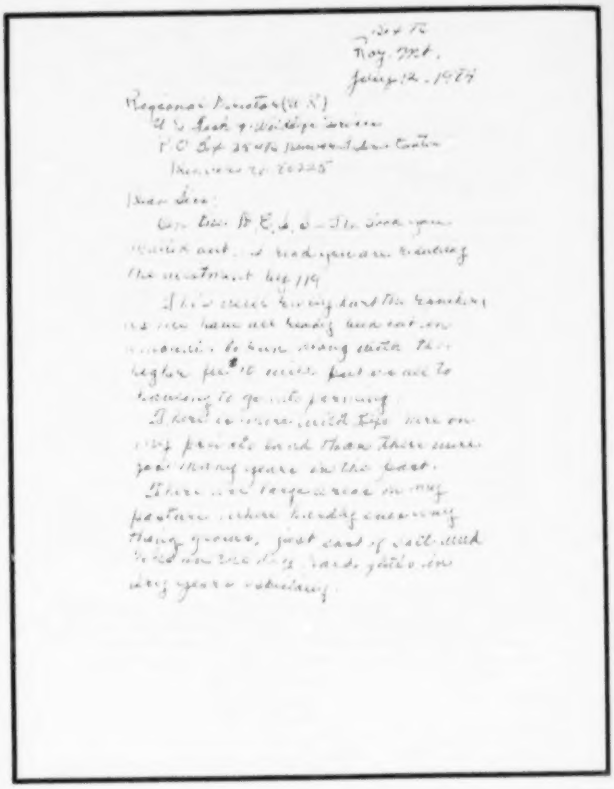
Thank you.

Sincerely,

Cynthia [illegible]
Emys Store
Jordan Mt

Response to Cynthia Burkien

1. Public hearing were held on the DEIS in Glasgow, Lewistown, and Missoula on July 31, August 1, and August 2, 1984, respectively.



Box 76
Roy, Mt.
July 12 - 1984

Regional Director (U.S.)
U.S. Fish & Wildlife Service
P.O. Box 25486 Denver Federal Center
Denver, Co. 80225

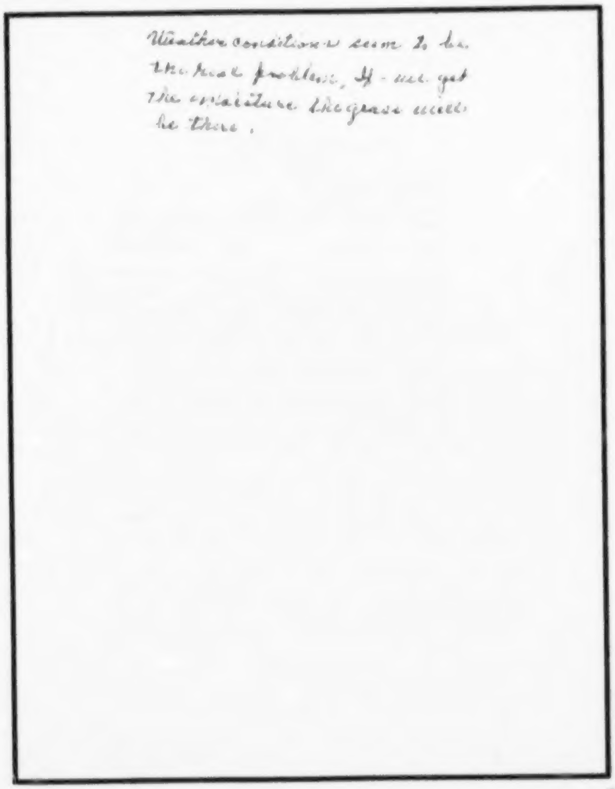
Dear Sirs:

On the D.E.I.S. - I [illegible] worked out. I read you are reducing the allotment by [illegible]

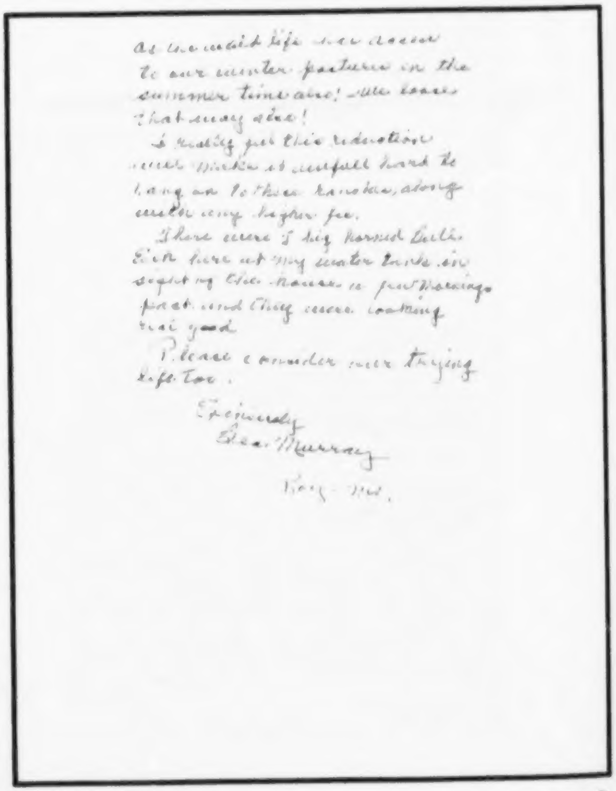
This will surely hurt the ranchers as we have all ready had cut [illegible] to have along with the higher fee* it will put us all to [illegible] to go into farming.

There is more wild life here on my private land than there were for many years in the past.

There are large areas in my pasture where healthy crested wheat grows, just east of [illegible] [illegible] big hard [illegible] in dry years [illegible].



Weather conditions seem to be the real problem, If we get the moisture the grass will be there.



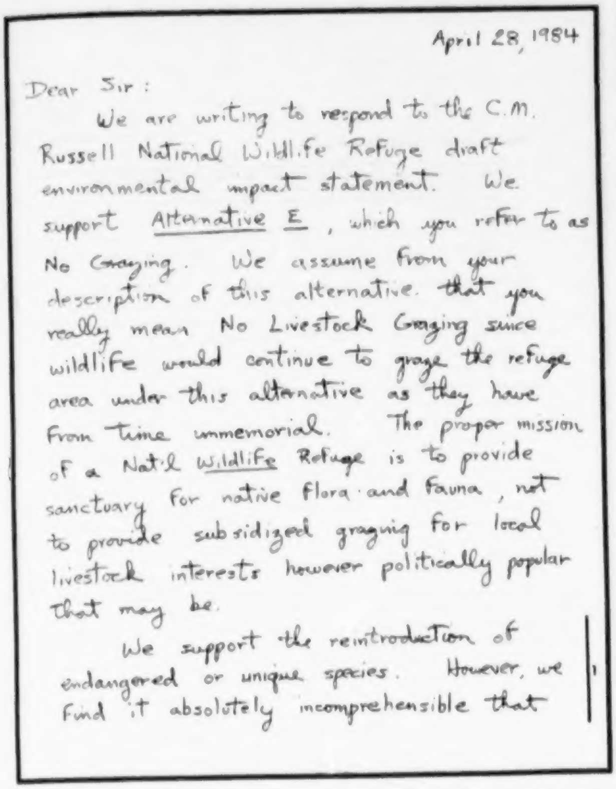
As we want life we desire to our winter pastures in the summer time also! We have that way also!

I really feel this reduction will make it awfull hard to hang on to these ranches, along with very higher fee.

There were 5 big horned Bulls Elk here at my water tank in sight of the house a few mornings past and they were looking real good.

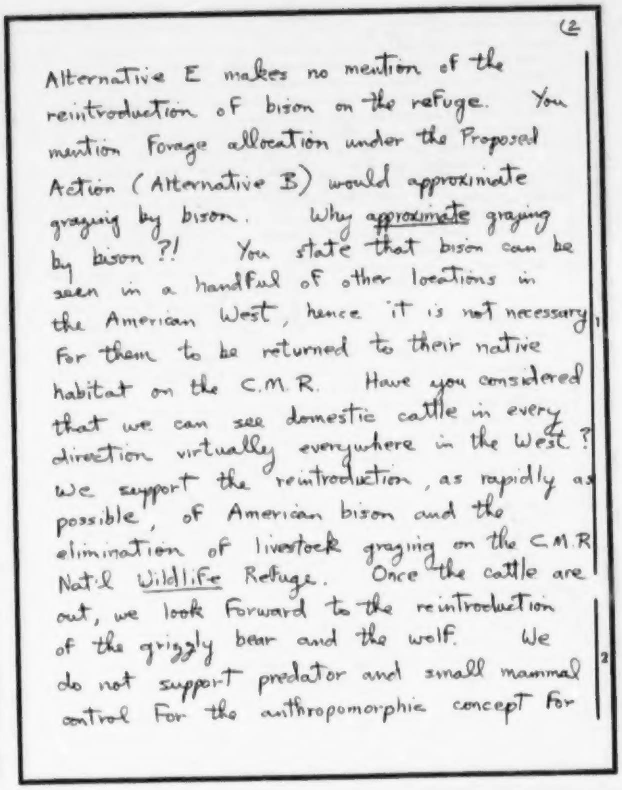
Please consider our trying life too.

Sincerely
Elsa Murray
Roy - Mt.



April 28, 1984

Dear Sir:
We are writing to respond to the C.M.
Russell National Wildlife Refuge draft
environmental impact statement. We
support Alternative E, which you refer to as
No Grazing. We assume from your
description of this alternative that you
really mean No Livestock Grazing since
wildlife would continue to graze the refuge
area under this alternative as they have
from time immemorial. The proper mission
of a Nat'l Wildlife Refuge is to provide
sanctuary for native flora and fauna, not
to provide subsidized grazing for local
livestock interests however politically popular
that may be.
We support the reintroduction of
endangered or unique species. However, we 1
find it absolutely incomprehensible that



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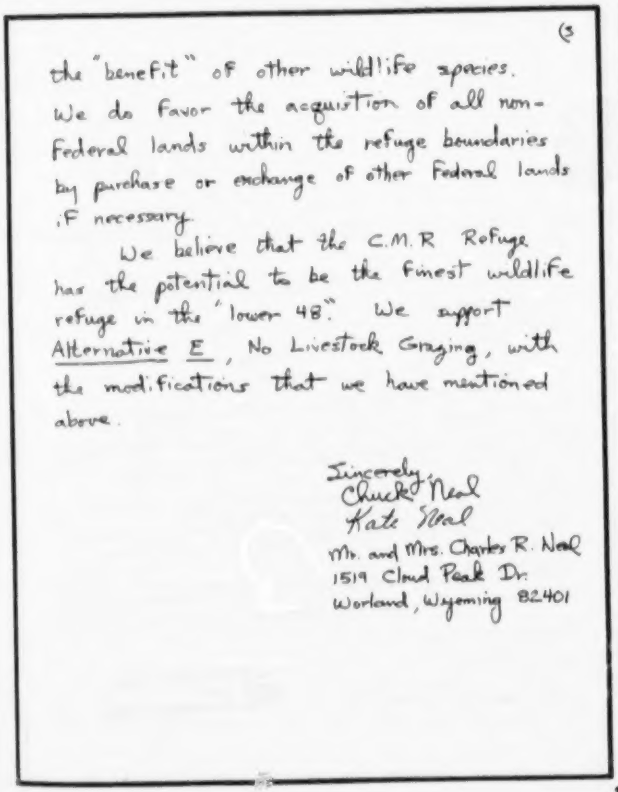
Alternative E makes no mention of the
reintroduction of bison on the refuge. You
mention forage allocation under the Proposed
Action (Alternative B) would approximate
grazing by bison. Why approximate grazing
by bison?! You state that bison can be
seen in a handful of other locations in
the American West, hence it is not necessary 1
for them to be returned to their native
habitat on the C.M.R. Have you considered
that we can see domestic cattle in every
direction virtually everywhere in the West?
We support the reintroduction, as rapidly as
possible, of American bison and the
elimination of livestock grazing on the C.M.R
Nat'l Wildlife Refuge. Once the cattle are
out, we look forward to the reintroduction
of the grizzly bear and the wolf. We
do not support predator and small mammal 2
control for the anthropomorphic concept for



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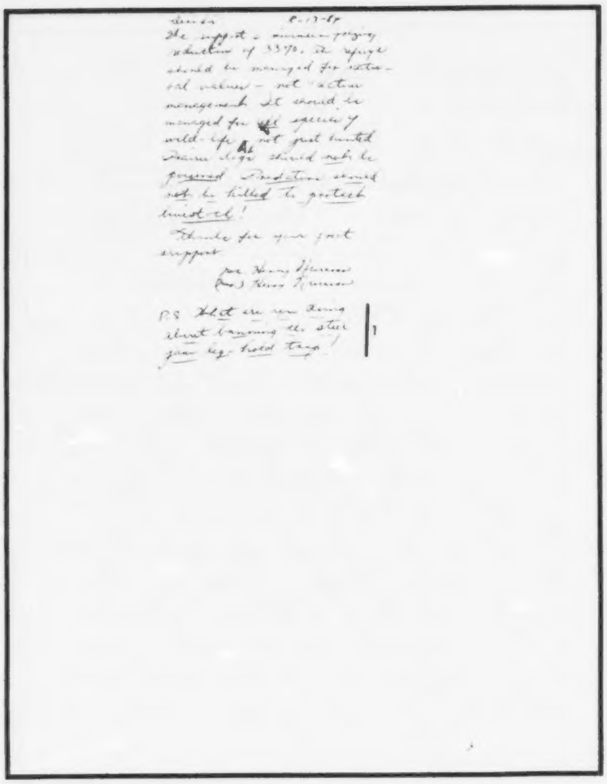
the "benefit" of other wildlife species.
We do favor the acquisition of all non-
Federal lands within the refuge boundaries
by purchase or exchange of other Federal lands
if necessary.
We believe that the C.M.R Refuge
has the potential to be the finest wildlife
refuge in the "lower 48". We support
Alternative E, No Livestock Grazing, with
the modifications that we have mentioned
above.

Sincerely,
Chuck Neal
Kate Neal
Mr. and Mrs. Charles R. Neal
1519 Cloud Peak Dr.
Worland, Wyoming 82401

Response to Mr. and Mrs. Charles R. Neal

1. Bison reintroduction is only included in the Intensive Wildlife Management alternative only. It was not included in the other alternatives because of the high cost and difficulty of fencing an area that would keep bison off of adjoining private lands.

2. FWS will not support the reintroduction of the grizzly bear and wolf on CMR because of the inadequacy of the habitat in terms of keeping them on the refuge and preventing them from causing serious depredations on adjacent private lands and possibly causing harm to people.



Dear Sir 6-13-84

We support a minimum grazing reduction of 33%. The refuge should be managed for natural values - not "active management. It should be managed for all species of wild-life, not just hunted. Prairie dogs should not be poisoned. Predators should not be killed to protect livestock!

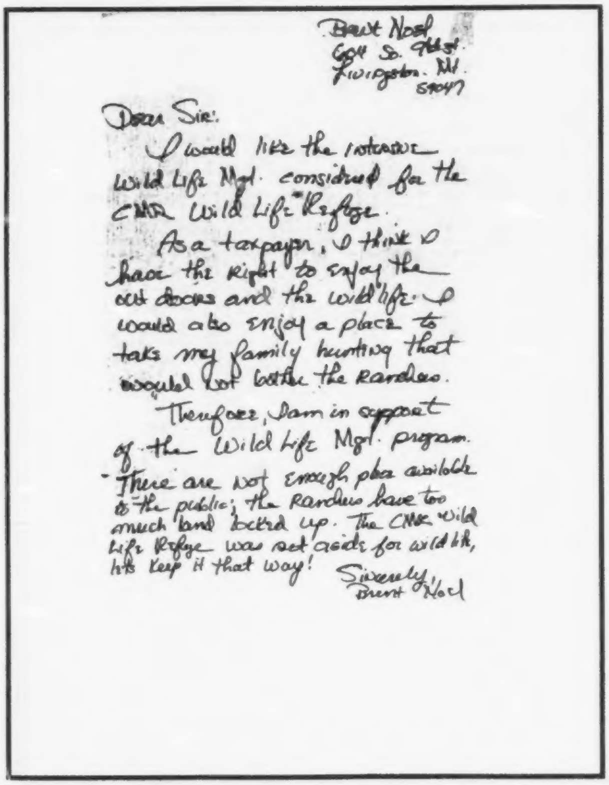
Thanks for your past support

Mr. Henry [illegible]
(Mrs.) [illegible] [illegible]

P.S. What are you doing about banning the steel jaw leg-hold traps! | 1

Response to Mr. and Mrs. [illegible]

1. Trapping is not currently permitted on CMR. Limited trapping may be permitted after finalization of the EIS. At that time a trapping plan would be prepared including any restrictions such as species, methods, etc., before any trapping is initiated. Public comment would be solicited.



Brent Noel
604 So. 9th St.
Livingston, Mt.
59047

Dear Sir:

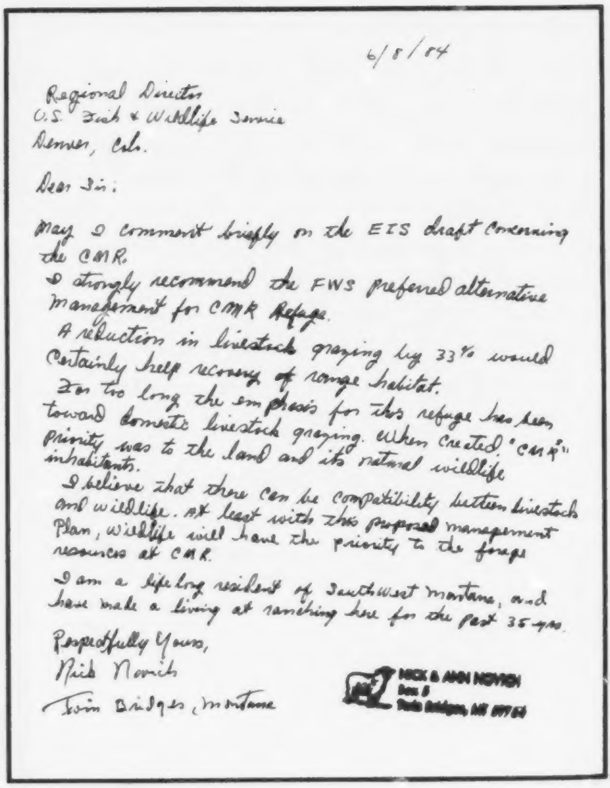
I would like the intensive Wild Life Mgt. considered for the CMR Wild Life Refuge.

As a taxpayer, I think I have the right to enjoy the out doors and the wild life. I would also enjoy a place to take my family hunting that would not bother the ranchers.

Therefore, I am in support of the Wild Life Mgt. program.

- There are not enough places available to the public; the ranchers have too much land locked up. The CMR Wild Life Refuge was set aside for wild life, let's keep it that way!

Sincerely,
Brent Noel



6/8/84

Regional Director
U.S. Fish & Wildlife Service
Denver, Colo.

Dear Sir:

May I comment briefly on the EIS draft concerning the CMR.

I strongly recommend the FWS preferred alternative management for CMR Refuge.

A reduction in livestock grazing by 33% would certainly help recovery of range habitat.

For too long the emphasis for this refuge has been toward domestic livestock grazing. When created "CMR" priority was to the land and its natural wildlife inhabitants.

I believe that there can be compatibility between livestock and wildlife. At least with this proposed management plan, wildlife will have the priority to the forage resources at CMR.

I am a lifelong resident of Southwest Montana, and have made a living at ranching here for the past 35 yrs.

Respectfully Yours,
Nick Novich
Twin Bridges, Montana

NICK & ANN NOVICH
Box 8
Twin Bridges, MT 59754

Gerald and Noma Nunn
Box 228
Winnett, Montana 59087
August 10, 1984

Robert E. Sheilds
Regional Director (WR)
U.S. Fish and Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, Colo. 80225

Mr. Sheilds:

In comment on your latest Draft Environmental Impact Statement on the management of the Charles M. Russell National Wildlife Refuge in Montana:

I was raised on a ranch on the Lower Musselshell River and have lived in this area most of my life. My husband and I have been ranching in Northern Petroleum County for the last 20 years and have had grazing permits on the Musselshell Trail Common and Soda Creek Allotments in the C.M.R. for that long. As natives of this area we feel we are as qualified as most, more than some, to respond to your E.I.S. Most of the general public, from other localities and other states know nothing about this region except what you choose to tell them, and we have noticed that it isn't always the complete story, to say the least.

In reviewing the latest E.I.S. on the C.M.R. we find it still woefully lacking in so far as being a true picture of range conditions, wildlife habitat, rainfall, etc. All the Alternatives are left, rather obviously, open to allow the Wildlife Service to do exactly as they please at any time they want to do it. The only real change in it are the extreme grazing cuts included in the favored No Action and Multiple Use Measures to discourage everyone from supporting them again. This is the most disgusting report it has ever been my misfortune to read. You say the Refuge is to be maintained in its natural state and then plan to spend millions to improve it. It must be nice to have a full sack of taxpayers money to drag behind you and no questions asked. You have already spent thousands of dollars analyzing the soil, forage, wildlife, rainfall, in hiring all your so-called experts, and in printing these drafts and reports.

In our country it would be a total waste to implement any of your plans for improvement. In the Bear Paw Shale, if the dams you are going to build hold through the first cloudburst, the water will seep out, and they will dry up or get sour before the summer is over. There may be one or two places it might work but they would silt up in a few years. As for planting any kind of forage or trees or shrubs, any thing that would grow in this soil with only 5 or 6 inches of rainfall is already here. our average rainfall may be 11 inches, but there alot of years we only get 5 or 6 inches. So far this year we have only had 4 inches. On wet years this country is like a garden, but there isn't many wet years. As for fencing on the Refuge, while you did mention the fact that the soil was unstable, you didn't say that where you would fence, on the boundaries, that it would be impossible to keep a fence standing. Of course, all you have to do is build it. The ranchers have to try to maintain it, under threat of instant trespass if their livestock is in the wrong place. With the loose soil and the further handicap of the elk and antelope going back and forth thru it, we will all need 2 more hired hands just to ride and fix fence.

While the Wildlife Service does say that an AUM is an Animal Unit Month, they try to leave the impression that there are 60,000 head of cattle grazing on the Refuge. Since most of the ranchers have an 8 month grazing permit there is seldom more that 7500 head of livestock on the Refuge at one time. Or was it done deliberately to encourage the various Wildlife and Audabon Societies and Federations to believe the lies our honorable C.M.R. manager, Mr. Freise, told the reporter from the Audabon Magazine, "He is the manager of a million acre cattle ranch, in charge of 900,000 head of livestock." * 1

In studying this latest example of how to use half truths, distorted facts, and downright lies to achieve your objectives, I find on the map (#2) on vegatation types that there is no grass or brush of any kind on the C.M.R. in Petroleum and Fergus Counties. We would like to know where your map making expert got his information, as there is a great abundance of grass and sage, not to mention other types of brush and forage in this region. There are pine 2 and juniper in the coulees but there is alot of it that does't have any trees. On page 166 another of your so-called experts voiced his opinion that shale should never be grazed by livestock. With propaganda like this in print how can we argue when you want to cut our permits? I wonder why it seems to work everywhere else and won't on the C.M.R.

The Wildlife Service would like everyone to believe that the domestic livestock frightens and disturbs the wildlife on the Refuge, besides overgrazing and causing untold amounts of erosion and other damage. This whole area has been eroding for thousands of years. That is how the breaks were formed. As 90% of the wildlife in Montana is on BLM, State, Forest Service, and Private lands, I would say this is a pretty good indication of their compatability with livestock and people. Ranchers everywhere have wintered too many wild animals and birds of every kind to believe that livestock or people bother them very much. Its not that they don't have enough browse or that their habitat is ruined either. Even in an open winter, the ranchers hay and grain looks and tastes a whole lot better than anything they can get in the hills. And we have open water!!! If, as the experts claim, all these grouse and other species of game birds need so much more cover, why do the ones in our area all stay up on the open ridges and grazed off flats? Our horse pasture is grazed closer than anywhere else on the ranch. Yet, last summer we had 2 hatchings of pintail grouse, 4 pairs of ducks, one pair of geese, and some pheasants. The pond isn't 100 feet from the house, and hasn't got all that much cover, but the ducks hatched out 7 or 8 ducklings apiece and there were 5 baby geese. We had 7 young grouse in the yard all summer. They even came up onto the porch. The best way to improve the habitat in the C.M.R. is to control the prairie dogs, and the best way to increase the wildlife population is to control the coyotes. But that would be too easy and wouldn't cost enough, and it wouldn't get rid of the ranchers.

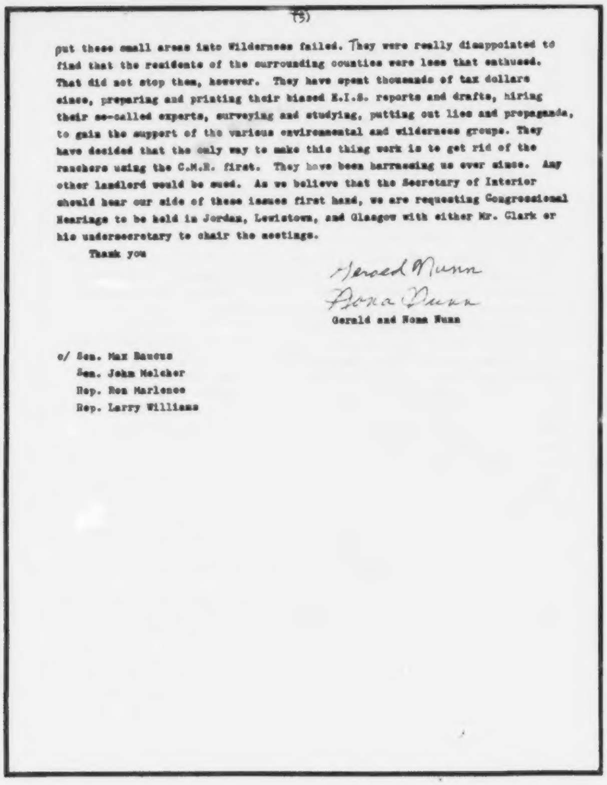
* Quote taken from the July, 1983 issue of the Audabon Magazine---

The Wildlife Service advisors are apparently not the experts they would like us to think they are, or they are deliberately withholding and distorting alot of pertinate facts and information. It is easy to blame the ranchers, hunters, and recreationists for their own mistakes. The plain truth is that alot of the birds and animals they have tried to introduce to the C.M.R. are incompatible with the breaks. They just won't adapt to that environment and will move out onto the BLM, State or Private lands. It does sound so much better though to tell people who don't know any better, that the ranchers, recreationists, and livestock is scaring them and ruining their habitat. The Wildlife Service would also have everyone believe that all of us ranchers around the Refuge are poachers, indiscriminately killing everything that crosses the Refuge boundary, and alot that doesn't. They don't mention that the few cases of poaching done in the last 20 years has been done by people clear out of the area, from Billings, Great Falls, and even out of state.

As for the grazing fee, "Our Government Subsidy", if it were true, it is the only subsidy the ranchers have ever gotten. However, let me mention a few facts that were apparently, (deliberately?)forgotten. If a man leases grass from a rancher, he pays according to what that rancher has to offer. If the rancher has a good, fenced pasture, takes complete care of the cattle, riding on them, or otherwise seeing to it they are always on good grass and water, doctoring those that need it, gathering them when the owner wants them, the lease is naturally much higher than if the owner has to look after them himself in rough, hard to ride country, sorting through other people's cattle, and trying to keep fences up that the elk and antelope are going back and forth through. We all feel that this exorbiant raise in our grazing fees and the unjustifiable 54% cut in our AUMs is totally ridiculous, unnecessary, absurd and just another way to phase us out if all else fails. Even your studies show the allotments in Petroleum County as being 100% good to excellent for wildlife habitat.

In all the figures the E.I.S. offered on the economic impact of the different Alternatives, we didn't see any mention made of what the cost of any of the projects would be to the taxpayers. At this time of depressed economy, when the government is trying desperately to cut back on all Federal spending, it seems to us that this would be of utmost importance to everyone. We would 3 really like to see an estimate of what the cost each Alternative would be to the taxpayer. It may have been left out to save explaining that any upkeep or maintainence of any of these projects would be left up to the rancher whose allotment it was on, with the threat of instant trespass fines or withdrawal of his permit if he doesn't comply. All in all, considering the state of the national economy, we would say that Alternative A (No Action) without the grazing cuts and mitigating measures, would be the one to support, but we believe that the Alternative D (Multiple Use) would be the best for all concerned, Therefore, we are supporting the Alternative D, without the grazing cuts or mitigating measures. While Alternative D wouldn't cost the tampayers any more, if as much, than the Alternative B (Proposed Action) it would bring alot of new economy into the region in the way of tourists, hunters, fishermen, recreationists, etc. Most of the expense that would be incurred in the way of fishing sites, marinas, cabins, advertizing or whatever, would be carried by the people developing them, as would be any mineral developement, if and when such a thing happened. Any wildlife that is compatible with the ecosystem of the breaks would stay in the Breaks, just as they always have, and the surrounding area would be open to any one who wanted to see or study the species that have moved out of the C.M.R. onto the BLM or private lands. Just as it always has been.

In 1976, shortly after the Wildlife Service took over the management of the C.M.R., they held a series of meetings in various places. We attended the one they held in Roy, Montana. They were all excited about what they called their "Long Range Plan" for the future of the C.M.R. Their "Master Plan was to designate several spots of 5000 acres or more as Wilderness Areas, and with the co-operation of the BLM, each year they would designate several more Areas, until they had them all hooked together and had an area 60 miles wide all the way around the Ft. Peck Lake. They planned to use the Grass Range to Circle hiway, the Circle to Wolf Point hiway, the Wolf Point to Malta hiway, and the Malta to Grass Range hiway as their boundaries. This was to be completed by the year 2000. In the meantime they would be putting together more small Wilderness Areas and with the help and co-operation of the BLM and other states would, by the year 2050, have a Wilderness Area 60 miles on each side of the Missouri River from the head to the mouth. When they were reminded that Hitler had a Master Plan and that having one didn't automatically make them right, they were still determined to go ahead with their "Master Plan". Their first attempts to



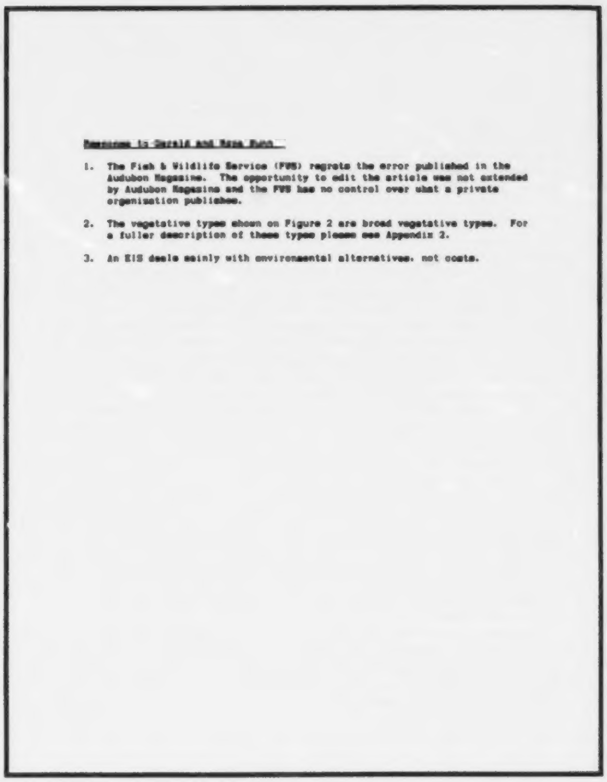
(5)

put these small areas into Wilderness failed. They were really disappointed to find that the residents of the surrounding counties were less that enthused. That did not stop them, however. They have spent thousands of tax dollars since, preparing and printing their biased E.I.S. reports and drafts, hiring their so-called experts, surveying and studying, putting out lies and propaganda, to gain the support of the various environmental and wilderness groups. They have decided that the only way to make this thing work is to get rid of the ranchers using the C.M.R. first. They have been harrassing us ever since. Any other landlord would be sued. As we believe that the Secretary of Interior should hear our side of these issues first hand, we are requesting Congressional Hearings to be held in Jordan, Lewistown, and Glasgow with either Mr. Clark or his undersecretary to chair the meetings.

Thank you

Gerald Nunn
Noma Nunn
Gerald and Noma Nunn

c/ Sen. Max Baucus
Sen. John Melcher
Rep. Ron Marlenee
Rep. Larry Williams

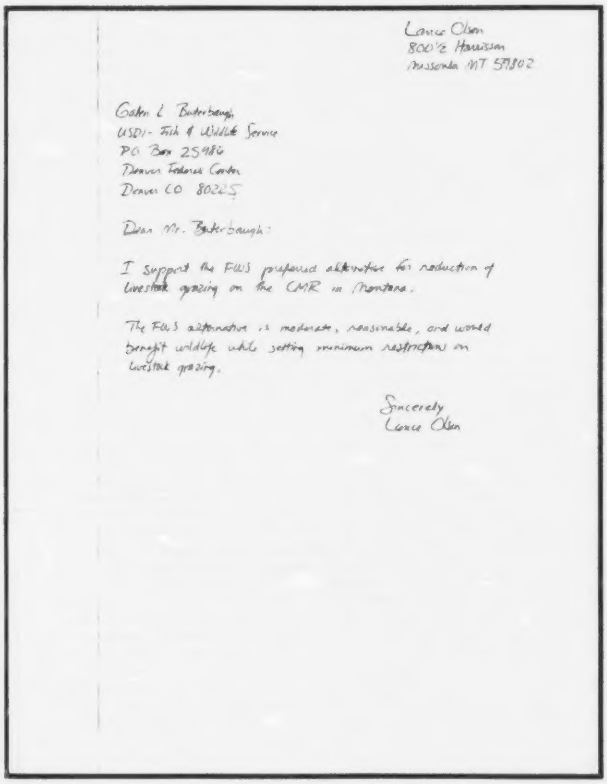


Response to Gerald and Noma Nunn

1. The Fish & Wildlife Service (FWS) regrets the error published in the Audubon Magazine. The opportunity to edit the article was not extended by Audubon Magazine and the FWS has no control over what a private organization publishes.

2. The vegetative types shown on Figure 2 are broad vegetative types. For a fuller description of these types please see Appendix 2.

3. An EIS deals mainly with environmental alternatives, not costs.



Lance Olsen
800½ Harrison
Missoula MT 59802

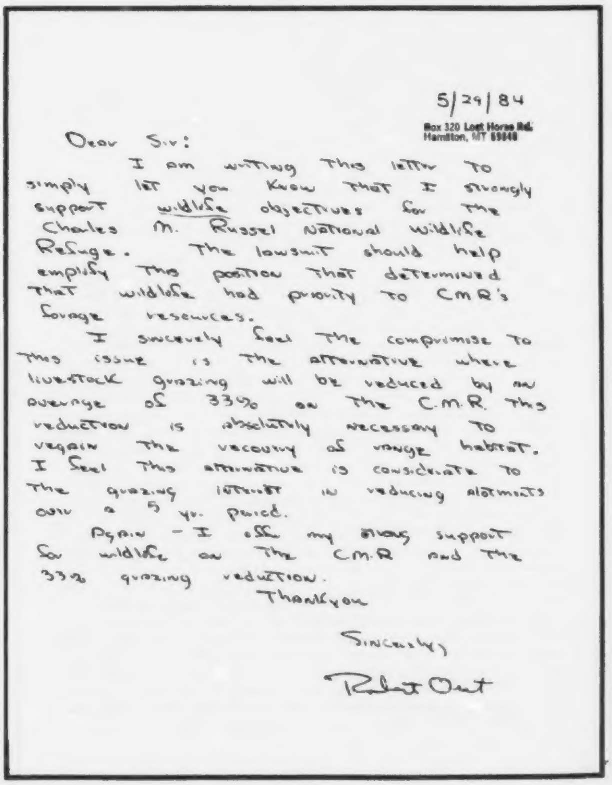
Galen L. Buterbaugh
USDI- Fish & Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver CO 80225

Dear Mr. Buterbaugh:

I support the FWS preferred alternative for reduction of livestock grazing on the CMR in Montana.

The FWS alternative is moderate, reasonable, and would benefit wildlife while setting minimum restrictions on livestock grazing.

Sincerely
Lance Olsen



5/29/84

Box 320 Lost Horse Rd.
Hamilton, MT 59840

Dear Sir:

I am writing this letter to simply let you know that I strongly support wildlife objectives for the Charles M. Russel National Wildlife Refuge. The lowsuit should help emplify the position that determined that wildlife had priority to CMR's forage resources.

I sincerely feel the comprimise to this issue is the alternative where livestock grazing will be reduced by an average of 33% on the C.M.R. This reduction is absolutely necessary to regain the recovery of range habitat. I feel this alternative is considerate to the grazing interest in reducing alotments over a 5 yr. period.

Again - I offer my strong support for wildlife on the C.M.R and the 33% grazing reduction.

Thankyou

Sincerely,

Robert Out

June 10, 1984

Regional Director
U.S. Fish and Wildlife Service
Box 25486
Denver Federal Center
Denver, CO 80225

Attention Regional Director

I am writing in support of the Fish and Wildlife Service's preferred alternative, outlined in the Draft Environmental Impact Statement, concerning management of the Charles Russell Wildlife Range in Garfield, Phillips, Valley, Fergus, and Petroleum Counties of Montana.

I am aware of the potential stocking reductions on some of the grazing allotments on the Range and support the preferred Alternative which allocates 60 percent of forage to wildlife, 40 percent to commercial livestock operators. I believe that this is the most prudent alternative for the following reasons:

1. Sixty percent forage allocation would recognise the amount of vegetation imperative to be left under prudent basic soil management efforts and range plant conservation needs. Wildlife forage and habitat needs will follow and be met.

2. Public range lands have historically been overgrazed. The lands in the CMR Wildlife Range are no exception despite efforts by administrators of the managing agencies. Special interests have, through political means, satisfied their needs, irrespective of management plans and basic laws' intent.

3. The preferred alternative recognises the basic enabling legislation's intent of wildlife habitat and yet can satisfy the needs of the cattle growers. The 40 percent forage allocation does not mean that the stockman goes out of business—rather, it means that he will stay in business longer, particularly during dry years. He has the potential to put more gain of weight on fewer animals. This alternative provides the best

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Regional Director, U.S. Fish and Wildlife Service
Page 2
June 10, 1984

approach to meeting soil and forage objectives and can meet wildlife and livestock production objectives as well. It would, for a long-needed change, start to manage range as the law intended.

I would suggest, for lack of detailed information, that the possibility of rest rotation grazing on those allotments, where reductions may be necessary, may help to reduce the immediate effect of reductions, and that studies be initiated to determine if, in fact, monetary loss is incurred in the long run by reductions. I believe that the progressive livestock growers can profit, over the long haul, under the Preferred Alternative for management.

David L. Owen
One Big Sky Blvd.
Kalispell, MT 59901

---

33 Rolling View Drive
Vernon, CT 06066
August 14, 1984

Galen Buterbaugh, Regional Director
U. S. Fish and Wildlife Service
P. O. Box 25468
Denver, CO 80225

Dear Mr. Buterbaugh:

I support reducing cattle grazing on the Charles M. Russell National Wildlife Refuge by at least 33%.

I find it difficult to understand why any cattle are allowed to graze on a piece of public property that has been set aside primarily for the support of wildlife. This land belongs to all Americans, not just a few ranchers who happen to live nearby. I, as an American citizen who shares in the ownership of this land, vote to use it in the following way.

1. Wildlife should be given priority.

2. All wildlife native to the area should be actively supported and protected including predators, non-game species, prairie dogs, and species such as black-footed ferrets and swift foxes that once lived in the area and can be reintroduced.

3. The land should be kept as close to its natural state as possible.

We have set aside these refuges for wildlife, not for ranching. I urge you to honor this decision of the citizens of the United States, which the courts have seen fit to uphold.

Sincerely yours,

Pershing Parker

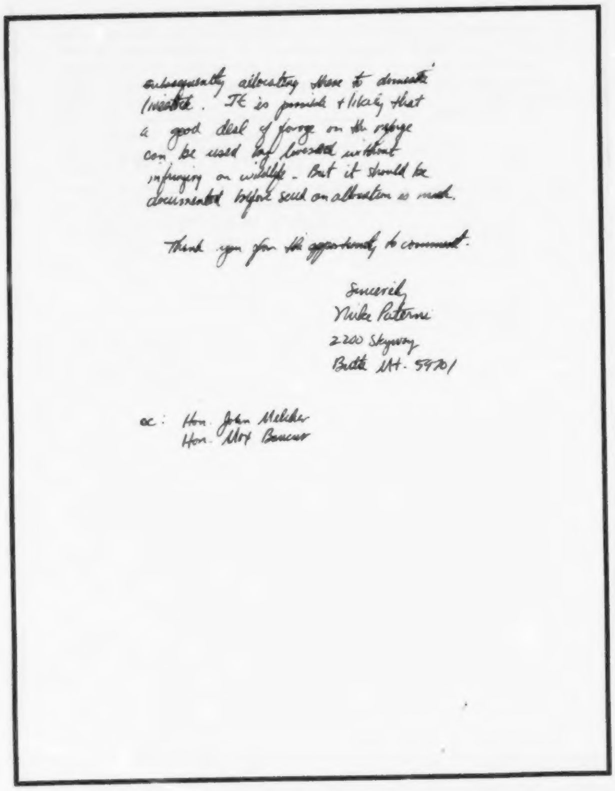
Pershing Parker

5/31/84

REGIONAL DIRECTOR
U.S. FISH & WILDLIFE SERVICE
BOX 25486
DENVER FEDERAL CENTER
DENVER CO 80225

Dear Sir:

This letter is to inform you of my opinion regarding management and allocation of forage on the C.M. Russell National Wildlife Refuge. Even though I live a full day's drive from the refuge I have hunted there at least 6 times in the last 10 years, generally looking for some good bird hunting or trophy mule deer. I wish to express my desire for the intensive wildlife management alternative. But, I am also in favor of a good monitoring program designed to identify those areas and forage resources which game birds & animals will not use, and

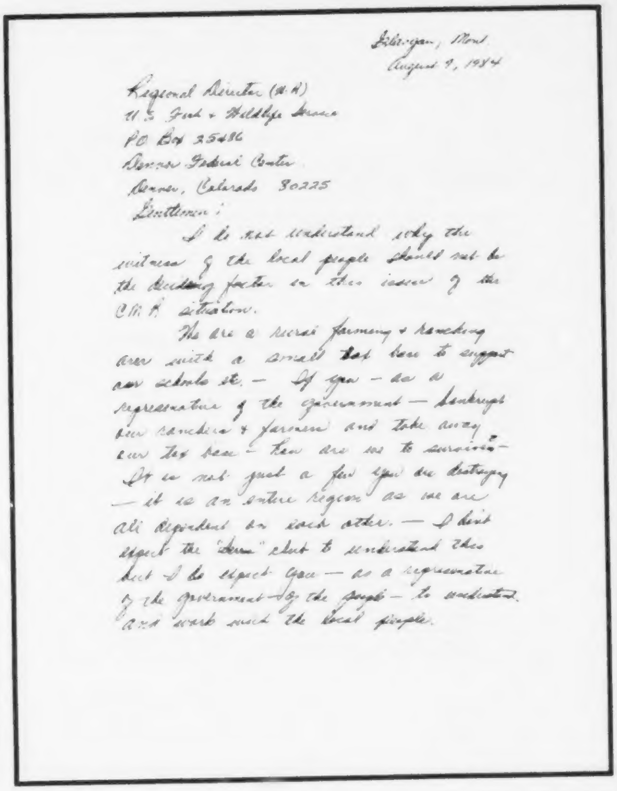


subsequently allocating those to domestic livestock. It is possible & likely that a good deal of forage on the refuge can be used by livestock without infringing on wildlife. But it should be documented before such an allocation is made.

Thank you for the opportunity to comment.

Sincerely,
Mike Paterni
2200 Skyway
Butte Mt. 59701

cc: Hon. John Melcher
Hon. Max Baucus



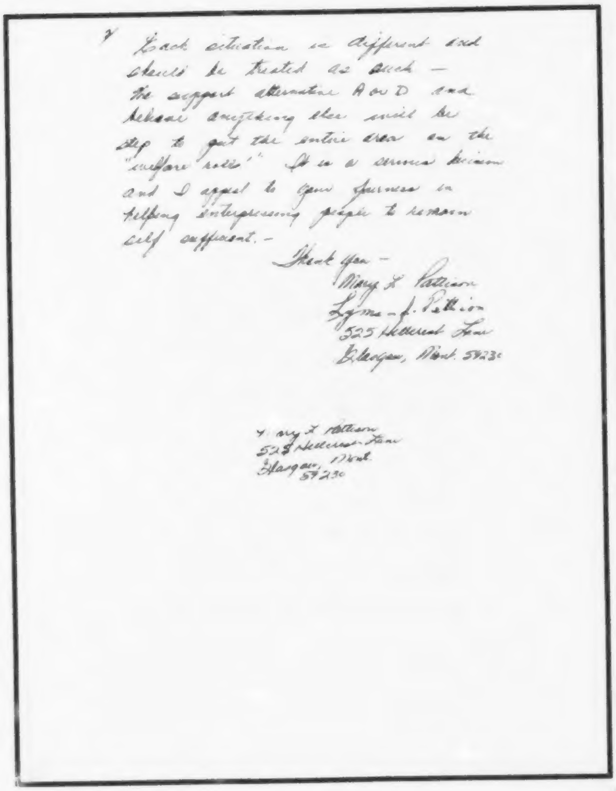
Glasgow, Mont.
August 9, 1984

Regional Director (W.R)
U.S. Fish & Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, Colorado 80225

Gentlemen:

I do not understand why the wishes of the local people should not be the deciding factor in this issue of the C.M.R. situation.

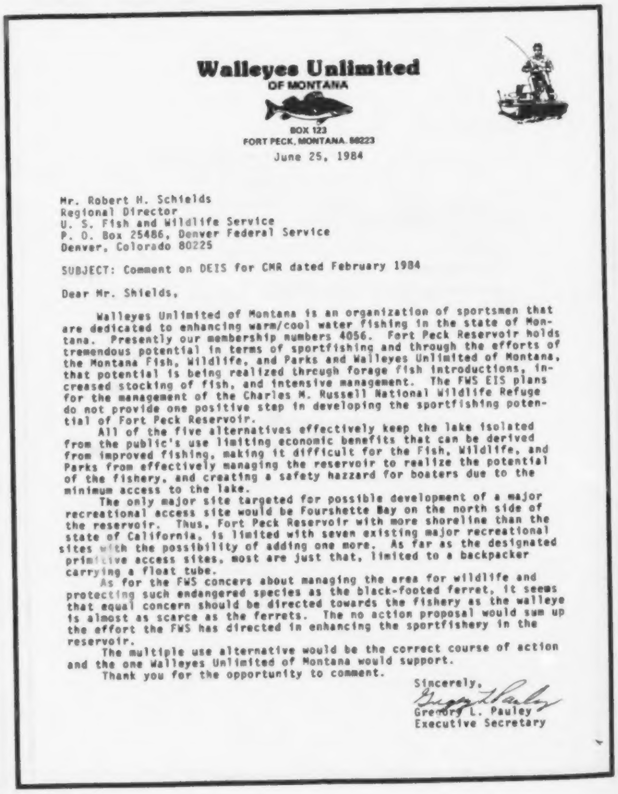
We are a rural farming & ranching area with a small tax base to support our schools etc. — If you — as a representative of the government — bankrupt our ranchers & farmers and take away our tax base — how are we to survive? — It is not just a few you are destroying — it is an entire region as we are all dependent on each other. — I don't expect the "Sierra" club to understand this but I do expect you — as a representative of the government — of the people — to understand and work with the local people.



7 Each situation is different and should be treated as such — We support alternative A or D and believe anything else will be step to put the entire area on the "welfare rolls". It is a serious decision and I appeal to your fairness in helping enterprising people to remain self sufficient. —

Thank you —
Mary L. Pattison
Lynn J. Pattison
525 Hillcrest Lane
Glasgow, Mont. 59230

Mary L Pattison
525 Hillcrest Lane
Glasgow, Mont
59230



Walleyes Unlimited
OF MONTANA
BOX 123
FORT PECK, MONTANA 59223

June 25, 1984

Mr. Robert H. Schields
Regional Director
U. S. Fish and Wildlife Service
P. O. Box 25486, Denver Federal Service
Denver, Colorado 80225

SUBJECT: Comment on DEIS for CMR dated February 1984

Dear Mr. Shields,

Walleyes Unlimited of Montana is an organization of sportsmen that are dedicated to enhancing warm/cool water fishing in the state of Montana. Presently our membership numbers 4056. Fort Peck Reservoir holds tremendous potential in terms of sportfishing and through the efforts of the Montana Fish, Wildlife, and Parks and Walleyes Unlimited of Montana, that potential is being realized through forage fish introductions, increased stocking of fish, and intensive management. The FWS EIS plans for the management of the Charles M. Russell National Wildlife Refuge do not provide one positive step in developing the sportfishing potential of Fort Peck Reservoir.

All of the five alternatives effectively keep the lake isolated from the public's use limiting economic benefits that can be derived from improved fishing, making it difficult for the Fish, Wildlife, and Parks from effectively managing the reservoir to realize the potential of the fishery, and creating a safety hazzard for boaters due to the minimum access to the lake.

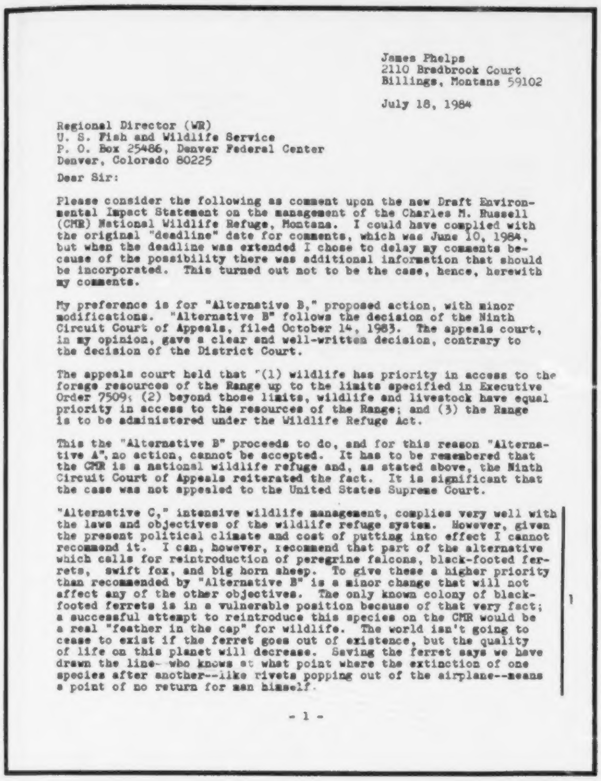
The only major site targeted for possible development of a major recreational access site would be Fourshette Bay on the north side of the reservoir. Thus, Fort Peck Reservoir with more shoreline than the state of California, is limited with seven existing major recreational sites with the possibility of adding one more. As far as the designated primitive access sites, most are just that, limited to a backpacker carrying a float tube.

As for the FWS concers about managing the area for wildlife and protecting such endangered species as the black-footed ferret, it seems that equal concern should be directed towards the fishery as the walleye is almost as scarce as the ferrets. The no action proposal would sum up the effort the FWS has directed in enhancing the sportfishery in the reservoir.

The multiple use alternative would be the correct course of action and the one Walleyes Unlimited of Montana would support.

Thank you for the opportunity to comment.

Sincerely,
Gregory L. Pauley
Gregory L. Pauley
Executive Secretary



James Phelps
2110 Bredbrook Court
Billings, Montana 59102

July 18, 1984

Regional Director (WR)
U. S. Fish and Wildlife Service
P. O. Box 25486, Denver Federal Center
Denver, Colorado 80225

Dear Sir:

Please consider the following as comment upon the new Draft Environmental Impact Statement on the management of the Charles M. Russell (CMR) National Wildlife Refuge, Montana. I could have complied with the original "deadline" date for comments, which was June 10, 1984, but when the deadline was extended I chose to delay my comments because of the possibility there was additional information that should be incorporated. This turned out not to be the case, hence, herewith my comments.

My preference is for "Alternative B," proposed action, with minor modifications. "Alternative B" follows the decision of the Ninth Circuit Court of Appeals, filed October 14, 1983. The appeals court, in my opinion, gave a clear and well-written decision, contrary to the decision of the District Court.

The appeals court held that "(1) wildlife has priority in access to the forage resources of the Range up to the limits specified in Executive Order 7509; (2) beyond those limits, wildlife and livestock have equal priority in access to the resources of the Range; and (3) the Range is to be administered under the Wildlife Refuge Act.

This the "Alternative B" proceeds to do, and for this reason "Alternative A", no action, cannot be accepted. It has to be remembered that the CMR is a national wildlife refuge and, as stated above, the Ninth Circuit Court of Appeals reiterated the fact. It is significant that the case was not appealed to the United States Supreme Court.

"Alternative C," intensive wildlife management, complies very well with the laws and objectives of the wildlife refuge system. However, given the present political climate and cost of putting into effect I cannot recommend it. I can, however, recommend that part of the alternative which calls for reintroduction of peregrine falcons, black-footed ferrets, swift fox, and big horn sheep. To give these a higher priority than recommended by "Alternative B" is a minor change that will not affect any of the other objectives. The only known colony of black-footed ferrets is in a vulnerable position because of that very fact; a successful attempt to reintroduce this species on the CMR would be a real "feather in the cap" for wildlife. The world isn't going to cease to exist if the ferret goes out of existence, but the quality of life on this planet will decrease. Saving the ferret says we have drawn the line--who knows at what point where the extinction of one species after another--like rivets popping out of the airplane--means a point of no return for man himself. 1

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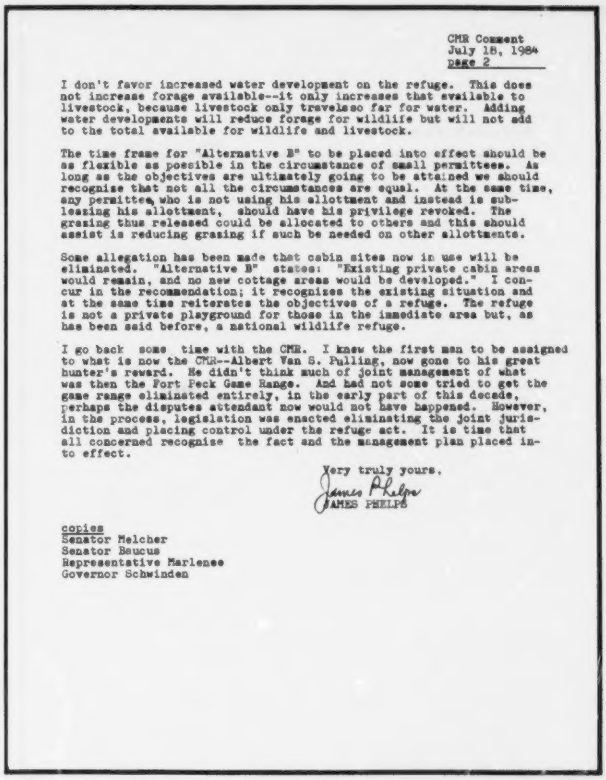


CMR Comment
July 18, 1984
page 2

I don't favor increased water development on the refuge. This does not increase forage available--it only increases that available to livestock, because livestock only travelso far for water. Adding water developments will reduce forage for wildlife but will not add to the total available for wildlife and livestock.

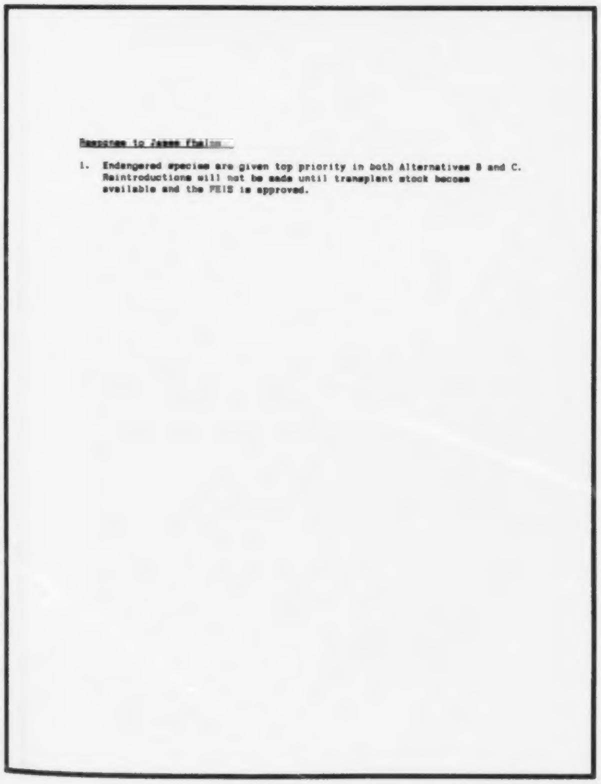
The time frame for "Alternative B" to be placed into effect should be as flexible as possible in the circumstance of small permittees. As long as the objectives are ultimately going to be attained we should recognise that not all the circumstances are equal. At the same time, any permittee, who is not using his allotment and instead is subleasing his allottment, should have his privilege revoked. The grazing thus released could be allocated to others and this should assist is reducing grazing if such be needed on other allottments.

Some allegation has been made that cabin sites now in use will be eliminated. "Alternative B" states: "Existing private cabin areas would remain, and no new cottage areas would be developed." I concur in the recommendation; it recognizes the existing situation and at the same time reiterates the objectives of a refuge. The refuge is not a private playground for those in the immediate area but, as has been said before, a national wildlife refuge.

I go back some time with the CMR. I knew the first man to be assigned to what is now the CMR--Albert Van S. Pulling, now gone to his great hunter's reward. He didn't think much of joint management of what was then the Fort Peck Game Range. And had not some tried to get the game range eliminated entirely, in the early part of this decade, perhaps the disputes attendant now would not have happened. However, in the process, legislation was enacted eliminating the joint jurisdiction and placing control under the refuge act. It is time that all concerned recognise the fact and the management plan placed into effect.

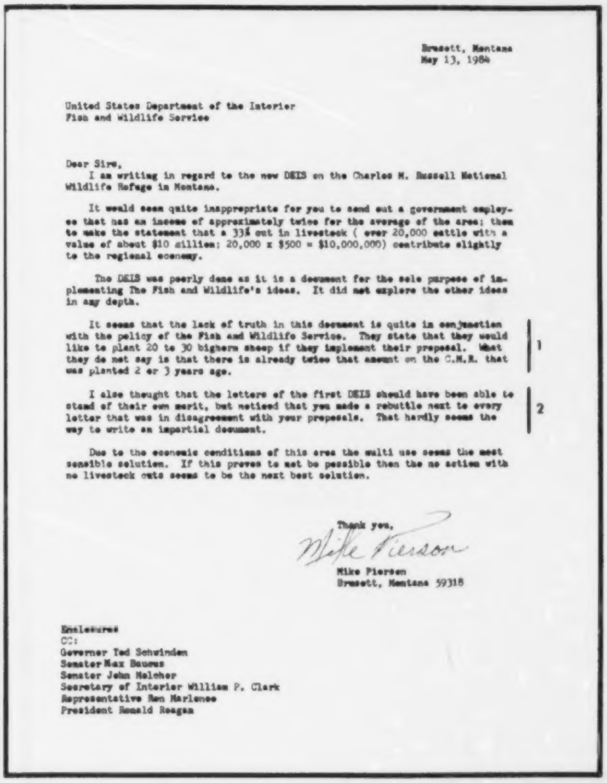
Very truly yours,
James Phelps
JAMES PHELPS

copies
Senator Melcher
Senator Baucus
Representative Marlenee
Governor Schwinden



Response to James Phelps

1. Endangered species are given top priority in both Alternatives B and C. Reintroductions will not be made until transplant stock become available and the FEIS is approved.



Brusett, Montana
May 13, 1984

United States Department of the Interior
Fish and Wildlife Service

Dear Sirs,

I am writing in regard to the new DEIS on the Charles M. Russell National Wildlife Refuge in Montana.

It would seem quite inappropriate for you to send out a government employee that has an income of approximately twice for the average of the area; then to make the statement that a 33% cut in livestock (over 20,000 cattle with a value of about $10 million; 20,000 x $500 = $10,000,000) contribute slightly to the regional economy.

The DEIS was poorly done as it is a document for the sole purpose of implementing The Fish and Wildlife's ideas. It did not explore the other ideas in any depth.

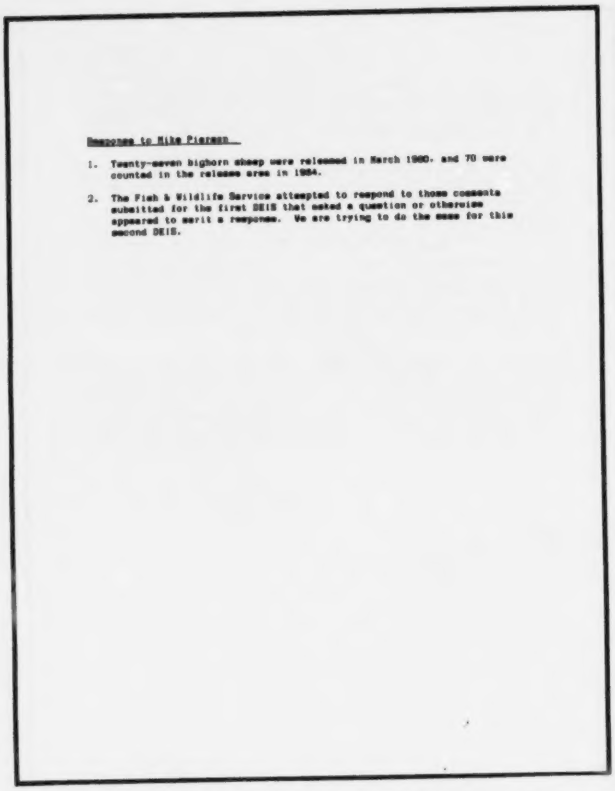
It seems that the lack of truth in this document is quite in conjunction with the policy of the Fish and Wildlife Service. They state that they would like to plant 20 to 30 bighorn sheep if they implement their proposal. What they do not say is that there is already twice that amount on the C.M.R. that was planted 2 or 3 years ago. 1

I also thought that the letters of the first DEIS should have been able to stand of their own merit, but noticed that you made a rebuttle next to every letter that was in disagreement with your proposals. That hardly seems the way to write an impartial document. 2

Due to the economic conditions of this area the multi use seems the most sensible solution. If this proves to not be possible then the no action with no livestock cuts seems to be the next best solution.

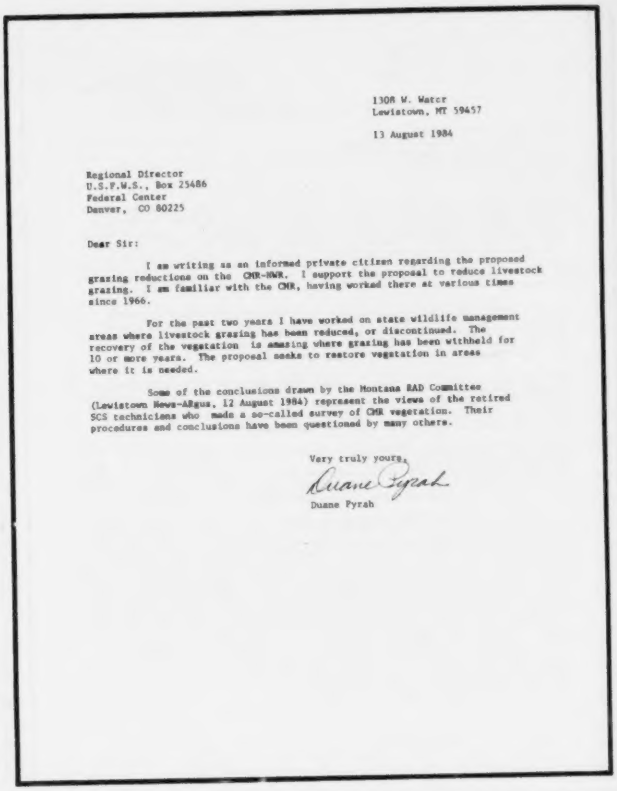
Thank you,
Mike Pierson
Mike Pierson
Brusett, Montana 59318

Enclosures
CC:
Governor Ted Schwinden
Senator Max Baucus
Senator John Melcher
Secretary of Interior William P. Clark
Representative Ron Marlenee
President Ronald Reagan



Response to Mike Pierson

1. Twenty-seven bighorn sheep were released in March 1980, and 70 were counted in the release area in 1984.
2. The Fish & Wildlife Service attempted to respond to those comments submitted for the first DEIS that asked a question or otherwise appeared to merit a response. We are trying to do the same for this second DEIS.



1308 W. Water
Lewistown, MT 59457

13 August 1984

Regional Director
U.S.F.W.S., Box 25486
Federal Center
Denver, CO 80225

Dear Sir:

I am writing as an informed private citizen regarding the proposed grazing reductions on the CMR-NWR. I support the proposal to reduce livestock grazing. I am familiar with the CMR, having worked there at various times since 1966.

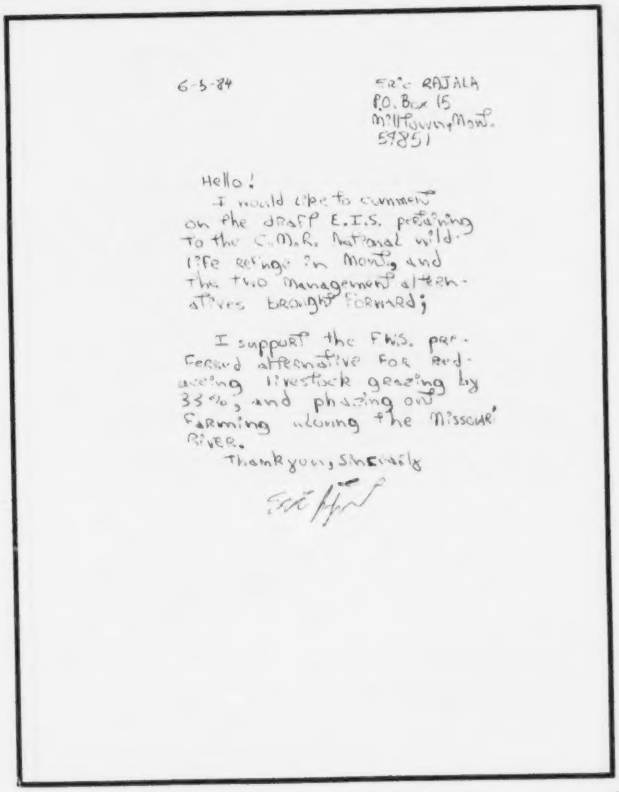
For the past two years I have worked on state wildlife management areas where livestock grazing has been reduced, or discontinued. The recovery of the vegetation is amazing where grazing has been withheld for 10 or more years. The proposal seeks to restore vegetation in areas where it is needed.

Some of the conclusions drawn by the Montana RAD Committee (Lewistown News-ARgus, 12 August 1984) represent the views of the retired SCS technicians who made a so-called survey of CMR vegetation. Their procedures and conclusions have been questioned by many others.

Very truly yours,

Duane Pyrah

Duane Pyrah



6-5-84

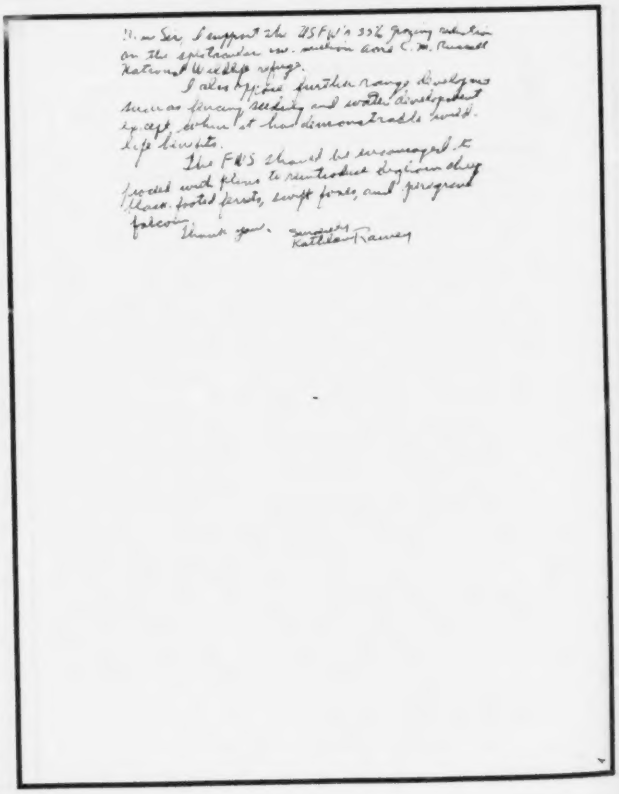
Eric RAJALA
P.O. Box 15
Milltown, Mont.
59851

Hello!

I would like to comment on the draft E.I.S. pertaining to the C.M.R. National wildlife Refuge in Mont., and the two management alternatives brought forward;

I support the FWS. preferred alternative for reducing livestock grazing by 33%, and phasing out farming along the Missouri River.

Thank you, Sincerely



Dear Sir, I support the USFW's 33% grazing reduction on the spectacular riv.-section along C. M. Russell National Wildlife refuge.

I also oppose further range developments such as fencing, seeding and water development except where it has demonstrable wildlife benefits.

The FWS should be encouraged to proceed with plans to reintroduce bighorn sheep, black-footed ferrets, swift foxes, and peregrine falcons.

Thank you. Sincerely
Kathleen Ramey

[illegible]
616 N. [illegible]
Missoula, Montana
59802

Regional Director,
U.S. Fish & Wildlife Service
Box 25486
Denver, Colorado 80225

June 7, 1984

Director,

What is a National Wildlife Refuge? As far as I have always been told, National Wildlife Refuges are designed to protect wildlife, to make sure they have enough to eat and a place to live. Since the proposed alternative is better than the current situation, the intensive wildlife management alternative would be closer to what the definition of National Wildlife Refuge was meant to be.

Yours truly,

---

731 Brush Valley Road
Boalsburg, PA 16827
June 4, 1984

Regional Director (WR)
U. S. Fish and Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, CO 80225

Dear Sir:

This letter addresses the proposed changes in livestock grazing on the Charles M. Russell National Wildlife Refuge as listed in the Revised Draft Environmental Impact Statement of April 1984.

I am in favor of Alternative 3 Intensive Wildlife Management, with the AUMs being cut by 50%. Wildlife should have priority over livestock on the Refuge. This reasoning was also supported by the Appellate Court in San Francisco in 1983 with its ruling that "Wildlife has priority to access to the forage resources of the range..." The issue of boundry fences should be dealt with as in most other refuges, certain areas of the Refuge should be fenced to control grazing. I'm sure grazing compromises will be made, but the compromise should be no less than that specified in the proposed alternative.

Sincerely,

Paul B. Rebarchak

Paul B. Rebarchak

PBR:jcw

HOFFMANN & RECTOR
ATTORNEYS AT LAW
THE FIRST NATIONAL BANK BUILDING
P. O. BOX 890
GLASGOW, MONTANA 59230

PAUL F. HOFFMANN RETIRED
JAMES D. RECTOR

TELEPHONE
228-4388
AREA CODE 406

May 21, 1984

Mr. Robert H. Shields
Regional Director
U. S. Dept. of the Interior
Fish and Wildlife Service
P. O. Box 25486
Denver, Colorado 80225

Re: Charles M. Russell National Wildlife Refuge -
Draft Environmental Impact Statement

Dear Director Shields:

Thank you for the copy of the DEIS referred to above. It is my request that the period for public comment on the DEIS be extended to May, 1985. The purpose for this request is to allow the persons who will be affected by the DEIS time to fully digest the length of this document and to give them time to comment about the full impact thereof.

I also request that public meetings be held by your agency in the areas surrounding the refuge so the persons who will be most affected by the DEIS will have an opportunity to at least give some input. I know your foreward indicates that meetings were held and the purpose of the meetings was to solicit and receive public input, but I assure you that I attended the meeting held in Glasgow in August, 1980, and no soliciting or receiving was going on. The meeting was highly structured where representatives of the Fish & Wildlife Service came in with the purpose to disorganize and to tell the people of Glasgow what they wanted them to hear and refused to hear and solicit any public comment concerning management of the National Wildlife Refuge. 1

It is my request that public meetings be held and complete transcripts of the meetings be kept, and that the input received at the meetings be considered when final action is taken in regard to the Environmental Impact Statement.

Your consideration would be most appreciated.

Sincerely,

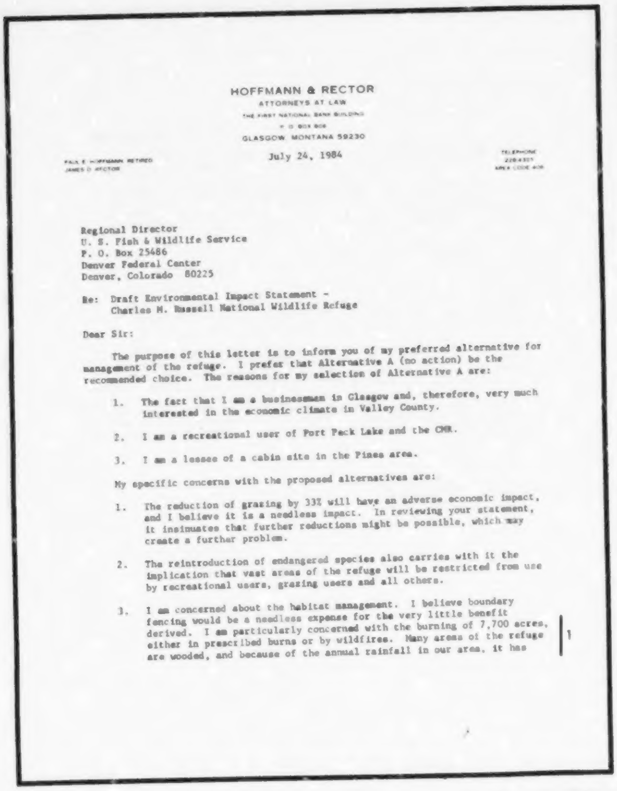
James D. Rector

JDR:vh

cc: Senator Max Baucus
Congressman Ron Marlenee
Senator John Melcher
Governor Ted Schwinden

Response to James D. Rector

1. Public hearings on the DEIS were held in Glasgow, Lewistown, and Missoula on July 31, August 1, and August 2, respectively. Complete transcripts of the hearings are reproduced at the back of this document. Input from both the letters of comment and testimony at hearings are considered in preparation of the FEIS.



HOFFMANN & RECTOR
ATTORNEYS AT LAW
THE FIRST NATIONAL BANK BUILDING
P. O. BOX [illegible]
GLASGOW, MONTANA 59230

PAUL E. HOFFMANN RETIRED
JAMES D. RECTOR

TELEPHONE
[illegible]
AREA CODE 406

July 24, 1984

Regional Director
U. S. Fish & Wildlife Service
P. O. Box 25486
Denver Federal Center
Denver, Colorado 80225

Re: Draft Environmental Impact Statement -
Charles M. Russell National Wildlife Refuge

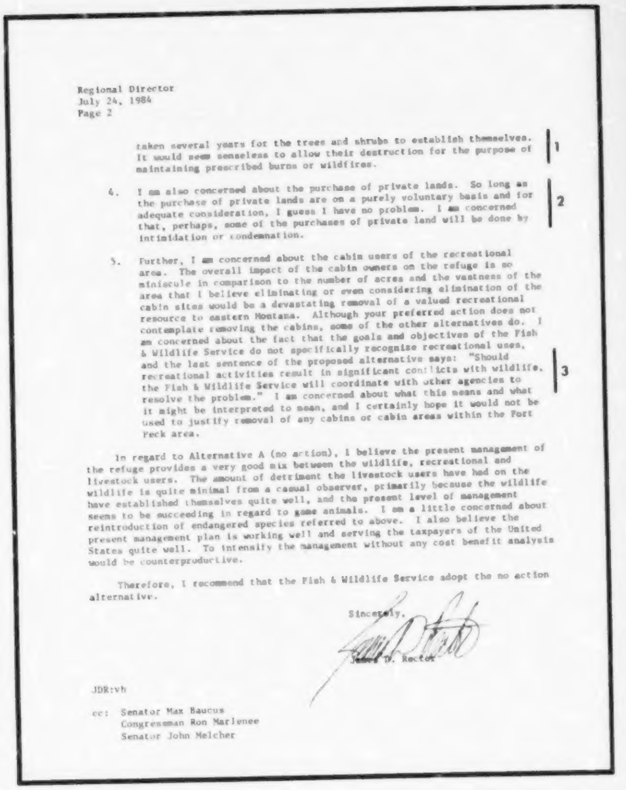
Dear Sir:

The purpose of this letter is to inform you of my preferred alternative for management of the refuge. I prefer that Alternative A (no action) be the recommended choice. The reasons for my selection of Alternative A are:

1. The fact that I am a businessman in Glasgow and, therefore, very much interested in the economic climate in Valley County.
2. I am a recreational user of Fort Peck Lake and the CMR.
3. I am a lessee of a cabin site in the Pines area.

My specific concerns with the proposed alternatives are:

1. The reduction of grazing by 33% will have an adverse economic impact, and I believe it is a needless impact. In reviewing your statement, it insinuates that further reductions might be possible, which may create a further problem.
2. The reintroduction of endangered species also carries with it the implication that vast areas of the refuge will be restricted from use by recreational users, grazing users and all others.
3. I am concerned about the habitat management. I believe boundary fencing would be a needless expense for the very little benefit derived. I am particularly concerned with the burning of 7,700 acres, either in prescribed burns or by wildfires. Many areas of the refuge are wooded, and because of the annual rainfall in our area, it has | 1



Regional Director
July 24, 1984
Page 2

taken several years for the trees and shrubs to establish themselves. It would seem senseless to allow their destruction for the purpose of maintaining prescribed burns or wildfires. | 1

4. I am also concerned about the purchase of private lands. So long as the purchase of private lands are on a purely voluntary basis and for adequate consideration, I guess I have no problem. I am concerned that, perhaps, some of the purchases of private land will be done by intimidation or condemnation. | 2
5. Further, I am concerned about the cabin users of the recreational area. The overall impact of the cabin owners on the refuge is so miniscule in comparison to the number of acres and the vastness of the area that I believe eliminating or even considering elimination of the cabin sites would be a devastating removal of a valued recreational resource to eastern Montana. Although your preferred action does not contemplate removing the cabins, some of the other alternatives do. I am concerned about the fact that the goals and objectives of the Fish & Wildlife Service do not specifically recognize recreational uses, and the last sentence of the proposed alternative says: "Should recreational activities result in significant conflicts with wildlife, the Fish & Wildlife Service will coordinate with other agencies to resolve the problem." I am concerned about what this means and what it might be interpreted to mean, and I certainly hope it would not be used to justify removal of any cabins or cabin areas within the Fort Peck area. | 3

In regard to Alternative A (no action), I believe the present management of the refuge provides a very good mix between the wildlife, recreational and livestock users. The amount of detriment the livestock users have had on the wildlife is quite minimal from a casual observer, primarily because the wildlife have established themselves quite well, and the present level of management seems to be succeeding in regard to game animals. I am a little concerned about reintroduction of endangered species referred to above. I also believe the present management plan is working well and serving the taxpayers of the United States quite well. To intensify the management without any cost benefit analysis would be counterproductive.

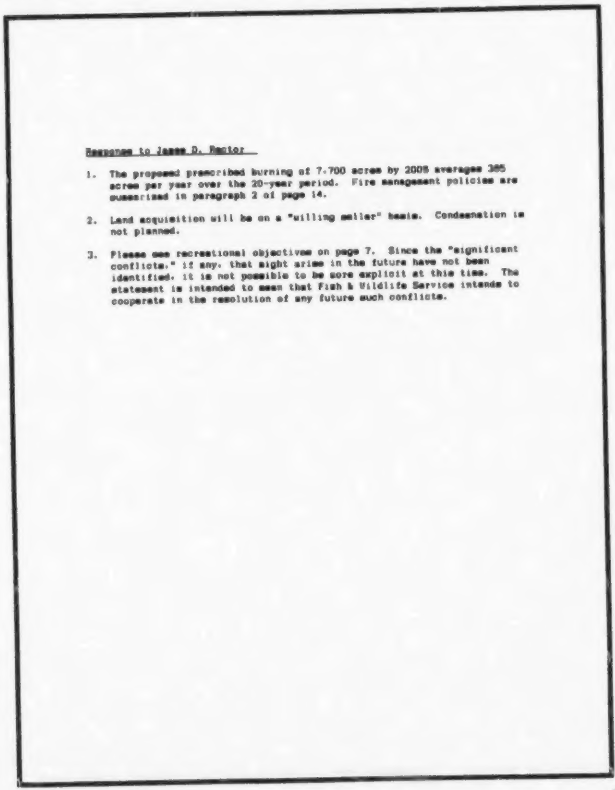
Therefore, I recommend that the Fish & Wildlife Service adopt the no action alternative.

Sincerely,

James D. Rector

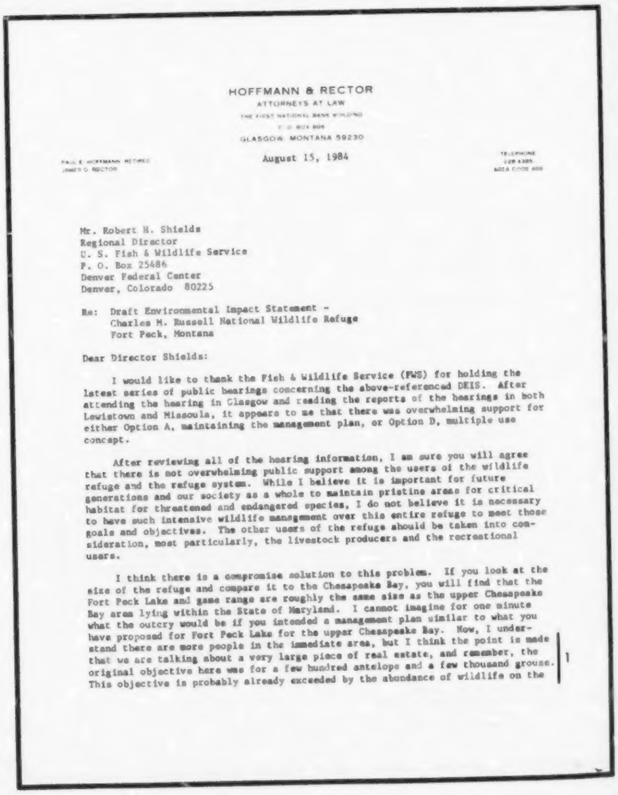
JDR:vh

cc: Senator Max Baucus
Congressman Ron Marlenee
Senator John Melcher



Response to James D. Rector

1. The proposed prescribed burning of 7,700 acres by 2005 averages 385 acres per year over the 20-year period. Fire management policies are summarized in paragraph 2 of page 14.
2. Land acquisition will be on a "willing seller" basis. Condemnation is not planned.
3. Please see recreational objectives on page 7. Since the "significant conflicts," if any, that might arise in the future have not been identified, it is not possible to be more explicit at this time. The statement is intended to mean that Fish & Wildlife Service intends to cooperate in the resolution of any future such conflicts.



HOFFMANN & RECTOR
ATTORNEYS AT LAW
THE FIRST NATIONAL BANK BUILDING
P. O. BOX [illegible]
GLASGOW, MONTANA 59230

PAUL E. HOFFMANN RETIRED
JAMES D. RECTOR

TELEPHONE
[illegible]
AREA CODE 406

August 15, 1984

Mr. Robert H. Shields
Regional Director
U. S. Fish & Wildlife Service
P. O. Box 25486
Denver Federal Center
Denver, Colorado 80225

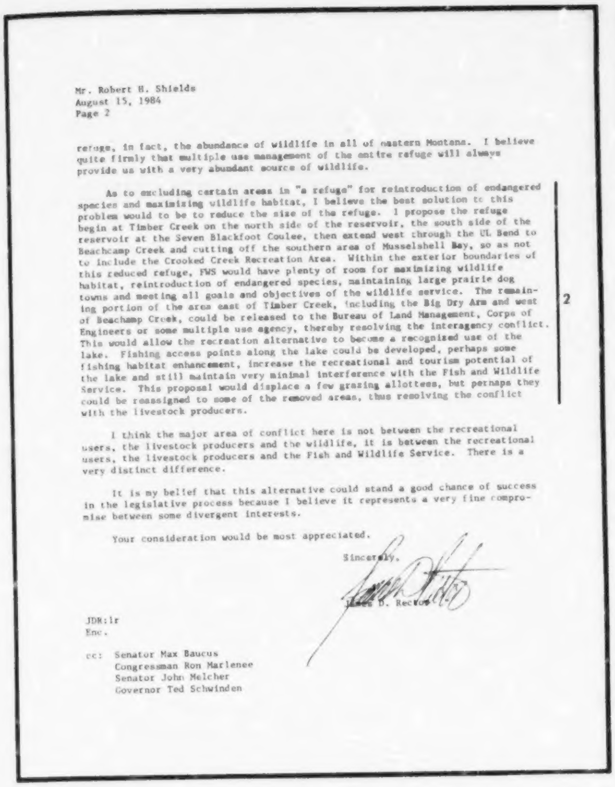
Re: Draft Environmental Impact Statement -
Charles M. Russell National Wildlife Refuge
Fort Peck, Montana

Dear Director Shields:

I would like to thank the Fish & Wildlife Service (FWS) for holding the latest series of public hearings concerning the above-referenced DEIS. After attending the hearing in Glasgow and reading the reports of the hearings in both Lewistown and Missoula, it appears to me that there was overwhelming support for either Option A, maintaining the management plan, or Option D, multiple use concept.

After reviewing all of the hearing information, I am sure you will agree that there is not overwhelming public support among the users of the wildlife refuge and the refuge system. While I believe it is important for future generations and our society as a whole to maintain pristine areas for critical habitat for threatened and endangered species, I do not believe it is necessary to have such intensive wildlife management over this entire refuge to meet those goals and objectives. The other users of the refuge should be taken into consideration, most particularly, the livestock producers and the recreational users.

I think there is a compromise solution to this problem. If you look at the size of the refuge and compare it to the Chesapeake Bay, you will find that the Fort Peck Lake and game range are roughly the same size as the upper Chesapeake Bay area lying within the State of Maryland. I cannot imagine for one minute what the outcry would be if you intended a management plan similar to what you have proposed for Fort Peck Lake for the upper Chesapeake Bay. Now, I understand there are more people in the immediate area, but I think the point is made that we are talking about a very large piece of real estate, and remember, the original objective here was for a few hundred antelope and a few thousand grouse. This objective is probably already exceeded by the abundance of wildlife on the | 1



Mr. Robert H. Shields
August 15, 1984
Page 2

refuge, in fact, the abundance of wildlife in all of eastern Montana. I believe quite firmly that multiple use management of the entire refuge will always provide us with a very abundant source of wildlife.

As to excluding certain areas in "a refuge" for reintroduction of endangered species and maximizing wildlife habitat, I believe the best solution to this problem would to be to reduce the size of the refuge. I propose the refuge begin at Timber Creek on the north side of the reservoir, the south side of the reservoir at the Seven Blackfoot Coulee, then extend west through the UL Bend to Beachcamp Creek and cutting off the southern area of Musselshell Bay, so as not to include the Crooked Creek Recreation Area. Within the exterior boundaries of this reduced refuge, FWS would have plenty of room for maximizing wildlife habitat, reintroduction of endangered species, maintaining large prairie dog towns and meeting all goals and objectives of the wildlife service. The remaining portion of the area east of Timber Creek, including the Big Dry Arm and west of Beachamp Creek, could be released to the Bureau of Land Management, Corps of Engineers or some multiple use agency, thereby resolving the interagency conflict. This would allow the recreation alternative to become a recognized use of the lake. Fishing access points along the lake could be developed, perhaps some fishing habitat enhancement, increase the recreational and tourism potential of the lake and still maintain very minimal interference with the Fish and Wildlife Service. This proposal would displace a few grazing allottees, but perhaps they could be reassigned to some of the removed areas, thus resolving the conflict with the livestock producers. 2

I think the major area of conflict here is not between the recreational users, the livestock producers and the wildlife, it is between the recreational users, the livestock producers and the Fish and Wildlife Service. There is a very distinct difference.

It is my belief that this alternative could stand a good chance of success in the legislative process because I believe it represents a very fine compromise between some divergent interests.

Your consideration would be most appreciated.

Sincerely,

James D. Rector

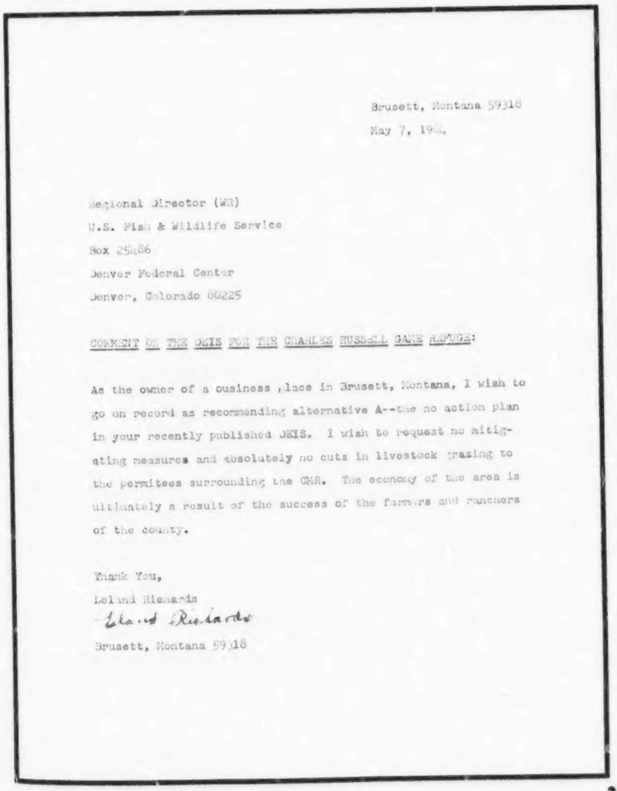
JDR:lr
Enc.

cc: Senator Max Baucus
Congressman Ron Marlenee
Senator John Melcher
Governor Ted Schwinden

Response to James D. Rector

1. Executive Order 7509 sets as sustainable objectives 1500 antelope and 400,000 sharp-tailed grouse for the Fort Peck Game Range (now the Charles M. Russell National Wildlife Refuge).

2. Reduction in the size of the refuge was seriously considered as an alternative early in the scoping process. This potential alternative was discarded because 1) along with other wildlife values, the eastern part of the refuge has high value for sharp-tailed grouse and antelope, 2) the western part has particular value for elk and deer, as well as for antelope and sharp-tailed grouse, and 3) Congressional action is required to dispose of any part of the refuge.



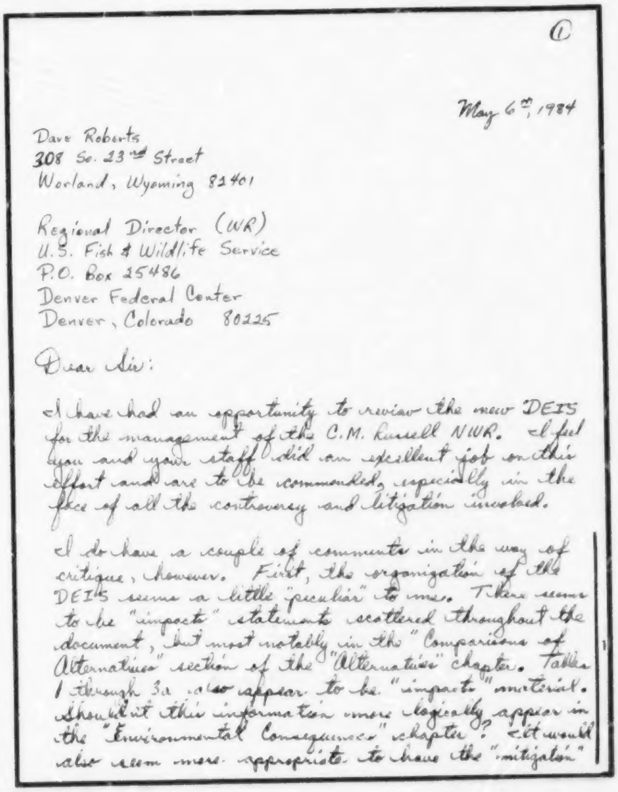
Brusett, Montana 59318
May 7, 19

Regional Director (WR)
U.S. Fish & Wildlife Service
Box 25486
Denver Federal Center
Denver, Colorado 80225

COMMENT ON THE DEIS FOR THE CHARLES RUSSELL GAME REFUGE:

As the owner of a business place in Brusett, Montana, I wish to go on record as recommending alternative A--the no action plan in your recently published DEIS. I wish to request no mitigating measures and absolutely no cuts in livestock grazing to the permitees surrounding the CMR. The economy of the area is ultimately a result of the success of the farmers and ranchers of the county.

Thank You,
Leland Richards
Leland Richards
Brusett, Montana 59318



①

May 6th, 1984

Dave Roberts
308 So. 23rd Street
Worland, Wyoming 82401

Regional Director (WR)
U.S. Fish & Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Sir:

I have had an opportunity to review the new DEIS for the management of the C.M. Russell NWR. I feel you and your staff did an excellent job on this effort and are to be commended, especially in the face of all the controversy and litigation involved.

I do have a couple of comments in the way of critique, however. First, the organization of the DEIS seems a little "peculiar" to me. There seems to be "impacts" statements scattered throughout the document, but most notably in the "Comparisons of Alternatives" section of the "Alternatives" chapter. Tables 1 through 3a also appear to be "impacts" material. Shouldn't this information more logically appear in the "Environmental Consequences" chapter? It would also seem more appropriate to have the "mitigation" 1

②

section in the "Environmental Consequences" chapter also, directly following a discussion of the impacts of each alternative.

Secondly, Alternative B (the Proposed Action) still allows 40,432 Federal AUM's of livestock grazing, even after a 33% reduction. Even for a refuge the size of the CMR this still seems like an awful heavy level of livestock use, especially considering the "unsuitability" of much of the refuge for cattle grazing.

For the record, I favor Alternative B (Proposed Action) with an even further reduced level of livestock grazing.

Thank you for the opportunity to review and comment on the new DEIS.

Respectfully yours,

Dave Roberts

Response to Dave Roberts

1. The EIS for CMR follows the recommended standard format for this document prescribed in the Federal Register. However, we agree that some of the statements and tables you refer to do deal with "impacts".

[illegible]
[illegible] Cattle Co
[illegible], MT 59[illegible]
Aug 13, 1984

Regional Director
U.S. Fish & Wildlife Svc
Box 25486
Denver, Co 80225

Dear Sir:

This is to present our comments on the D.E.I.S. for C.M.R. Wildlife Range.

A document prepared by bureaucrats for bureaucrats. Detailing opportunities to enhance wildlife production [illegible] have existed for many, many years. I see a great reduction on the [illegible] part to be [illegible] toward this end. (Comparing cow to elk, [illegible] points not used - big horn sheep water developing etc.) In the summary section this document [illegible] the [illegible] toward development (range resources, water, winter forage) this [illegible] document slanted to [illegible] (CMR permittees) and the [illegible] of helping wildlife. The permittees have been doing such a poor job of range management why the [illegible] forage increase between the 1963 range survey and 1978 survey? 1

Being a neighbor to CMR is [illegible] to a few [illegible] [illegible] a communist country. CMR [illegible] [illegible] (prescribed [illegible], [illegible], [illegible] [illegible], etc.)

[illegible] tell us what they're going to do under the different scenarios. [illegible] sensible action would either be alternative A or B.

Thank You

Response to James Robinson

1. The relatively slight increase (2.7%) in forage between the 1952 and 1978 range surveys indicate an improvement in range conditions since 1952. However, range condition and wildlife habitat condition are not synonymous.

REGIONAL DIRECTOR (WR)
U.S. Fish & Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, CO 80225

July 20, 1984
2104 Clar
Billings, Montana 59102

Regional Director:

As a member of the Yellowstone Audubon Chapter here in Billings I have been to the CMR Refuge. I met the staff and was able to visit many of the areas of the refuge. I saw the results of the efforts of the refuge staff and was excited by the beauty of the dry rugged sagebrush and Juniper covered rock outcrops and semidesert canyons.

The Refuge should be managed in a natural way to preserve that beauty. This can be done with grazing reduction at least the amount proposed or more. If the management includes all species of wildlife not just the hunted. This includes Prairie Dogs that are not poisoned. Fencing the refuge in areas would control grazing. Wildlife has priority over livestock according to court action and that is the way it should be.

I favor the proposed action of the Fish and Wildlife Service, proposal B, and hope your action will help Wildlife Management to cut AUM'S at least 32.8%.

Sincerely,
Bill Honey
Bill Honey

---

306 East Story
Bozeman, Montana 59715
August 11, 1984

Regional Director (WR)
U.S. Fish and Wildlife Service
P.O. Box 25486 Denver Fed. Cen.
Denver, Colorado 80225

Dear Sir:

I am pleased to have the opportunity to respond to the environmental impact statement regarding the Charley Russell National Wildlife Refuge.

I am one of the four range scientists who made the 1978 ecological site and condition survey on the CMR. Prior to the 1978 inventory I was Party Chief of SCS Range Conservationists who made site and condition inventories on 50,450 acres on the Nichols Coulee unit in 1966; 177,580 acres on the Slippery Ann unit in 1967; and 51,084 acres on the UL Bend unit in 1969.

In the 10 year span between the late 1960 inventories and the inventory of 1978 there was a definate trend of improved range condition - except in areas of prairie dog towns. In that same 10 year span acres and numbers of prairie dog towns increased drastically.

The 1978 inventory shows that 92 percent of the 850,000 acres was in good to exellent condition. I commend the refuge management for having that high a percentage of "top" condition range. In 35 years of making site and condition inventories, the CMR has by far the largest percentage of good and excellent condition range that I have experienced.

Nearly all the poor condition and some of the fair condition range that we mapped was due to vegetation destruction by prarie dogs.

With 92 percent of the range in good to excellent condition, it is obvious that neither livestock nor wildlife ungulates are in excessive numbers.

I feel in determining stocking rates the utilization cuts computed by F&WS personnel were much too severe. Badland sites were eliminated entirely and most of the steeper slopes were given an unreasonably high utilization cut. I have discussed this situation with Jack Rogers and Robert Richardson, Montana SCS State Soil Scientist and Soil Correlator. They suggest the only areas that would not provide some grazing are rock outcrop, shale outcrop, river outwash and beach sand. Range sites such as Badlands, Shale, Thin breaks, and Panspots are grazeable by both livestock and wildlife but at a limited amount. SCS stocking rate guides comensate for this reduced forage production and physical features of the site.

In areas of the Missouri Breaks the steep slopes are relatively short and therefore do not present as much of a grazing or distribution problem as is exhibited by long steep slopes in the foothills and mountain areas. Both livestock and game animals traverse and graze the steep short slopes. 1

Utilization cuts were also too severe for distances from water. Many of the permitees who experience this as a problem graze these areas in the fall or winter. The livestock require less water then and can utilize snowbanks and other water available at that time of year.

In areas of long distances from water, water developments could and should be installed if at all possible. Additional water in these areas would be benefitial to both wildlife and livestock. This is an important tool of resource management.

As I study the DEIS I see very little positive interaction of wildlife and livestock.

It appears F&WS came up with an over-all available forage figure of 109,336 AUM's on the 760,000 acres of federally owned land in the CMR. In the late 1960 inventories made by the SCS Range Scientists, the AUM figure arrived at was 61,198 AUM's on 37 percent of the total acreas of federally owned land. And this AUM figure was computed when the range was in lower condition than in 1978. 2

18,658 acres of the federal land consists of rock outcrop, shale outcrop, river wash or beach sand. These areas produce little or no vegetation. This leaves a total of 741,352 federal acres that provide forage for livestock and wildlife. The following set of stocking rate figures based on SCS Grazing Guides and the 1978 site and condition inventory is suggested as being more realistic than the 109,336 AUM's as listed in the DEIS:

Sites	% of total area	Acres	AUM/Ac.	AUM's
Above normal (OV,SL)	2	14,287	.4	5,931
Normal (Sy,Si, Cy)	24	177,925	.3	53,378
Below normal (TH, SwC, Sw,Ps,DC)	40	296,541	.2	59,308
Way below normal (B1,Sh)	34	252,099	.1	25,204
	100%	741,352 Ac.		143,823 Aum's

Approximately 60,000 AUM's are presently allocated to livestock on the CMR. By dividing 60,000 by the 143,823 AUM's produced in an average year, it is obvious that livestock uses only 42 percent of the total AUM's available.

In Summary:

1. The range area which is 90% good and excellent condition needs no reduction in livestock or wildlife ungulates. The 33% overall suggested reduction in livestock numbers is unwarranted.

2. The F&WS should develop and carry out a positive plan for control of prairie dogs.

3. The utilization cuts used by F&WS to compute AUM's and proposed livestock reductions are unreasonably severe.

4. Additional water developments should be installed to enhance both wildlife and livestock.

5. The F&WS should use the ecological site and condition inventory as a management tool for developing resource stability and vegetative cover to enhance habitat for wildlife, livestock and watershed protection.

6. I strongly urge adoption of the NO ACTION alternative as discussed in the DEIS.

I am glad to have the opportunity to respond to this important issue and hope for improved relations between F&WS personnel and ranchers.

Robert L. Ross

Robert. L. Ross, Range Ecologist

Response to Robert L. Ross

1. The slope-water deductions for AUM's were based on year round actual observations of cattle grazing patterns on CMR. Please see Appendix 15.

2. The methodology used to determine the total AUM's available to both livestock and wildlife are explained in detail in Appendices 7, 8, and 15.

---

4 June 84
Box 93 59911
Swan Lake, Mont.

Regional Director
U.S. Fish & Wildlife Service,

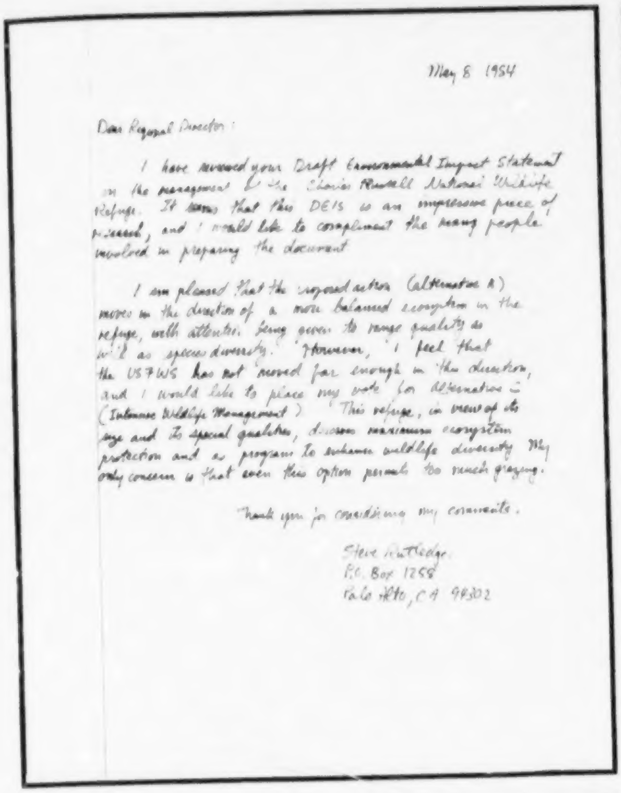
Although I live in Arizona during the winter, I was born in Glasgow where many of our family still live.

We support Montana in everyway possible. Bought a car & truck in the last three years and purchase our clothing, accessories, and everything possible in the Big Sky Country.

The Rundles' are very encouraged that you plan on increasing wildlife forage by 33% in the CMR Refuge.

As I tell people in the south - "Montana is like America used to be."

Sincerely
John D. Rundle



May 8 1984

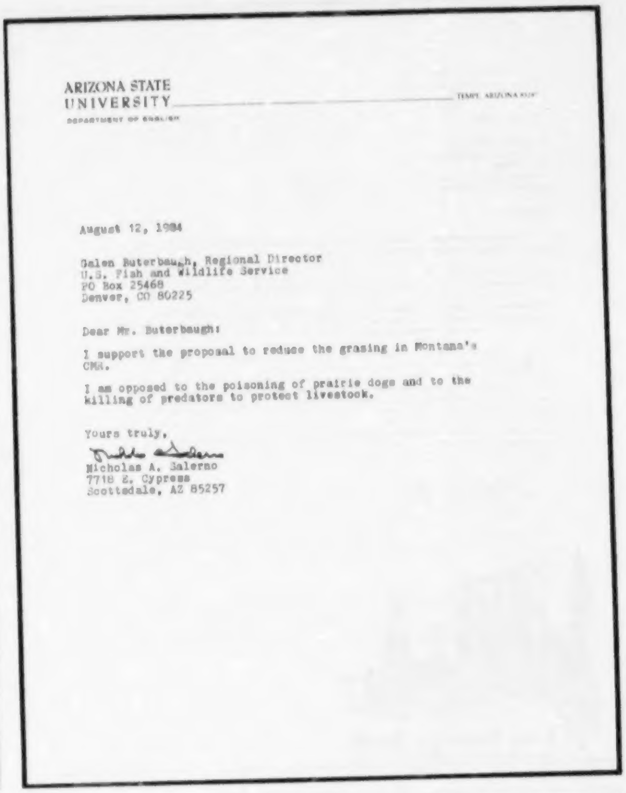
Dear Regional Director:

I have reviewed your Draft Environmental Impact Statement on the management of the Charles Russell National Wildlife Refuge. It seems that this DEIS is an impressive piece of research, and I would like to compliment the many people involved in preparing the document.

I am pleased that the proposed action (Alternative A) moves in the direction of a more balanced ecosystem in the refuge, with attention being given to range quality as well as species diversity. However, I feel that the USFWS has not moved far enough in this direction, and I would like to place my vote for Alternative C (Intensive Wildlife Management). This refuge, in view of its size and its special qualities, deserves maximum ecosystem protection and a program to enhance wildlife diversity. My only concern is that even this option permits too much grazing.

Thank you for considering my comments.

Steve Rutledge
P.O. Box 1258
Palo Alto, CA 94302



ARIZONA STATE
UNIVERSITY
TEMPE, ARIZONA 85287
DEPARTMENT OF ENGLISH

August 12, 1984

Galen Buterbaugh, Regional Director
U.S. Fish and Wildlife Service
PO Box 25468
Denver, CO 80225

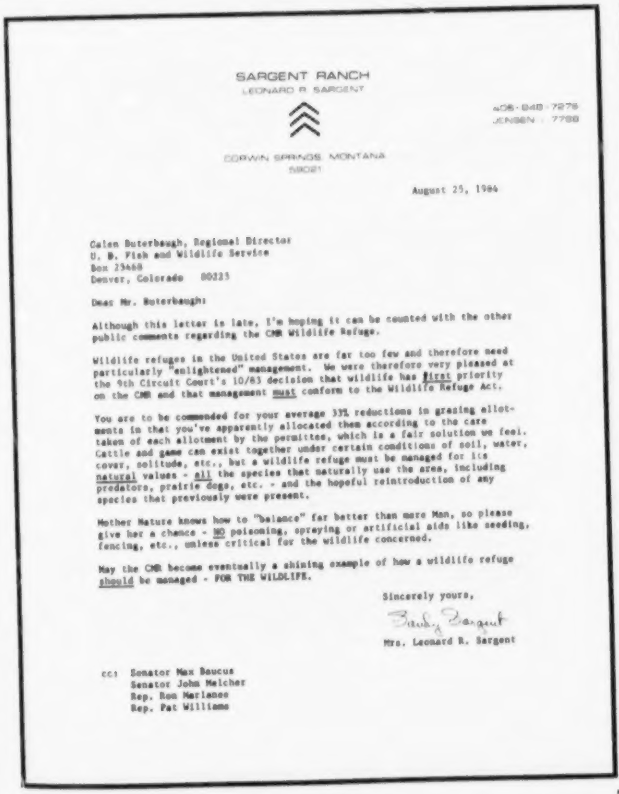
Dear Mr. Buterbaugh:

I support the proposal to reduce the grazing in Montana's CMR.

I am opposed to the poisoning of prairie dogs and to the killing of predators to protect livestock.

Yours truly,

Nicholas A. Salerno
7718 E. Cypress
Scottsdale, AZ 85257



SARGENT RANCH
LEONARD R. SARGENT
406-848-7276
JENSEN - 7788
CORWIN SPRINGS, MONTANA
59021

August 25, 1984

Galen Buterbaugh, Regional Director
U. S. Fish and Wildlife Service
Box 25468
Denver, Colorado 80225

Dear Mr. Buterbaugh:

Although this letter is late, I'm hoping it can be counted with the other public comments regarding the CMR Wildlife Refuge.

Wildlife refuges in the United States are far too few and therefore need particularly "enlightened" management. We were therefore very pleased at the 9th Circuit Court's 10/83 decision that wildlife has first priority on the CMR and that management must conform to the Wildlife Refuge Act.

You are to be commended for your average 33% reductions in grazing allotments in that you've apparently allocated them according to the care taken of each allotment by the permittee, which is a fair solution we feel. Cattle and game can exist together under certain conditions of soil, water, cover, solitude, etc., but a wildlife refuge must be managed for its natural values - all the species that naturally use the area, including predators, prairie dogs, etc. - and the hopeful reintroduction of any species that previously were present.

Mother Nature knows how to "balance" far better than mere Man, so please give her a chance - NO poisoning, spraying or artificial aids like seeding, fencing, etc., unless critical for the wildlife concerned.

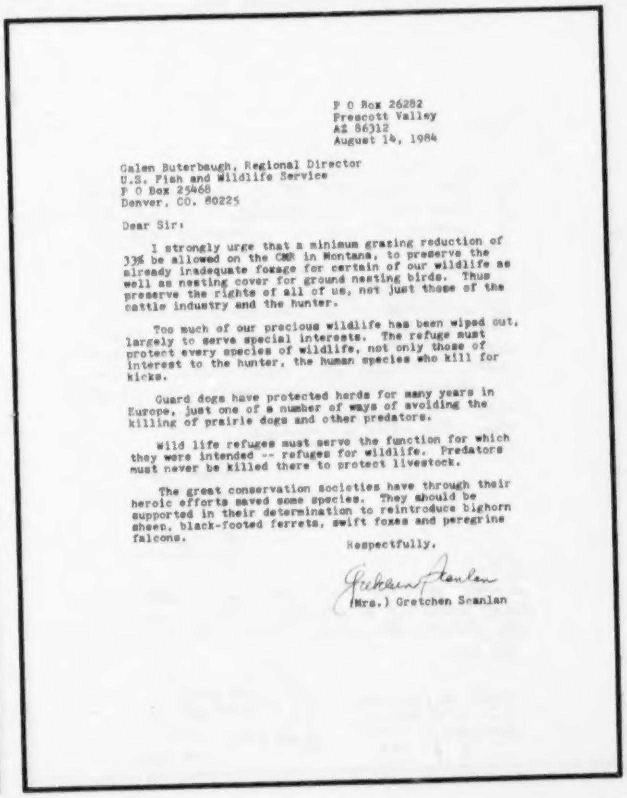
May the CMR become eventually a shining example of how a wildlife refuge should be managed - FOR THE WILDLIFE.

Sincerely yours,

Becky Sargent

Mrs. Leonard R. Sargent

cc: Senator Max Baucus
Senator John Melcher
Rep. Ron Marlenee
Rep. Pat Williams



P O Box 26282
Prescott Valley
AZ 86312
August 14, 1984

Galen Buterbaugh, Regional Director
U.S. Fish and Wildlife Service
P O Box 25468
Denver, CO. 80225

Dear Sir:

I strongly urge that a minimum grazing reduction of 33% be allowed on the CMR in Montana, to preserve the already inadequate forage for certain of our wildlife as well as nesting cover for ground nesting birds. Thus preserve the rights of all of us, not just those of the cattle industry and the hunter.

Too much of our precious wildlife has been wiped out, largely to serve special interests. The refuge must protect every species of wildlife, not only those of interest to the hunter, the human species who kill for kicks.

Guard dogs have protected herds for many years in Europe, just one of a number of ways of avoiding the killing of prairie dogs and other predators.

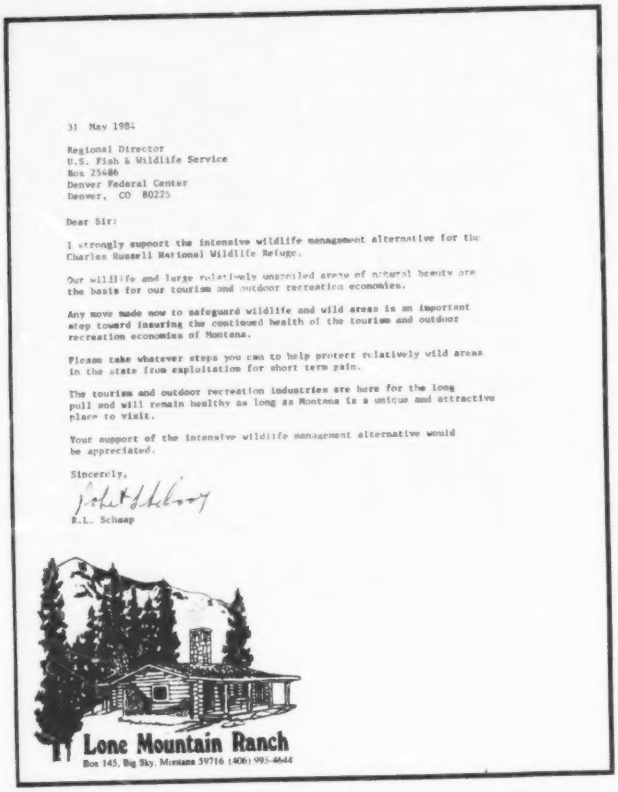
Wild life refuges must serve the function for which they were intended -- refuges for wildlife. Predators must never be killed there to protect livestock.

The great conservation societies have through their heroic efforts saved some species. They should be supported in their determination to reintroduce bighorn sheep, black-footed ferrets, swift foxes and peregrine falcons.

Respectfully,

Gretchen Scanlan

(Mrs.) Gretchen Scanlan


31 May 1984

Regional Director
U.S. Fish & Wildlife Service
Box 25486
Denver Federal Center
Denver, CO 80225

Dear Sir:

I strongly support the intensive wildlife management alternative for the Charles Russell National Wildlife Refuge.

Our wildlife and large relatively unspoiled areas of natural beauty are the basis for our tourism and outdoor recreation economies.

Any move made now to safeguard wildlife and wild areas is an important step toward insuring the continued health of the tourism and outdoor recreation economies of Montana.

Please take whatever steps you can to help protect relatively wild areas in the state from exploitation for short term gain.

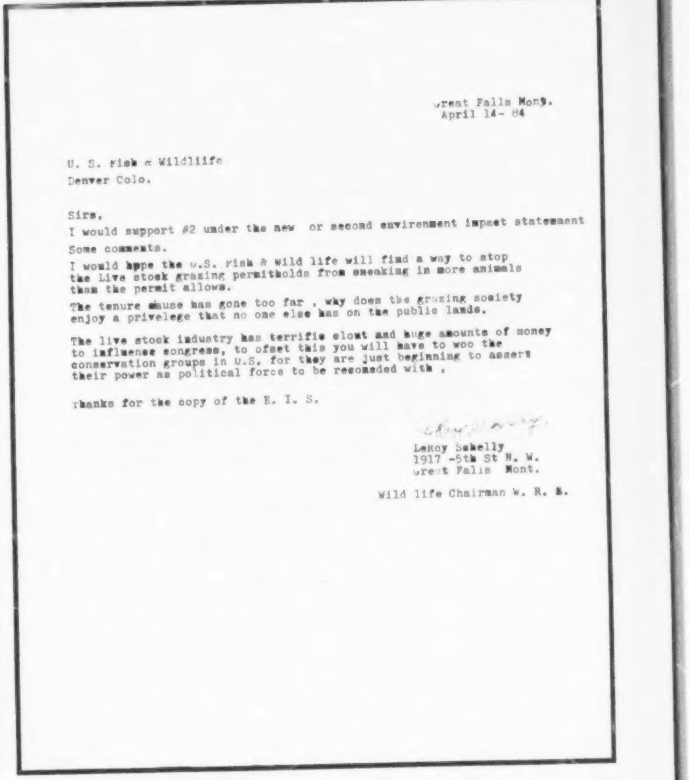
The tourism and outdoor recreation industries are here for the long pull and will remain healthy as long as Montana is a unique and attractive place to visit.

Your support of the intensive wildlife management alternative would be appreciated.

Sincerely,

R.L. Schaap

Lone Mountain Ranch
Box 145, Big Sky, Montana 59716 (406) 995-4644


Great Falls Mont.
April 14- 84

U. S. Fish & Wildlife
Denver Colo.

Sirs,

I would support #2 under the new or second environment impact statemnent

Some comments.

I would hope the U.S. Fish & wild life will find a way to stop the Live stock grazing permitholds from sneaking in more animals than the permit allows.

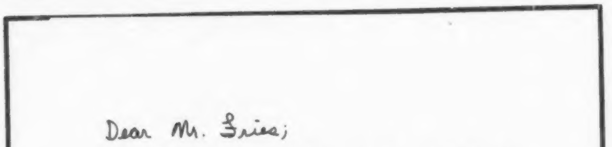
The tenure cause has gone too far , why does the grazing society enjoy a privelege that no one else has on the public lands.

The live stock industry has terrific clout and huge amounts of money to influence congress, to ofset this you will have to woo the conservation groups in U.S. for they are just beginning to assert their power as political force to be recomeded with .

Thanks for the copy of the E. I. S.

LeRoy Schelly
1917 -5th St N. W.
Great Falls Mont.

Wild life Chairman W. R. A.


Dear Mr. Fries;

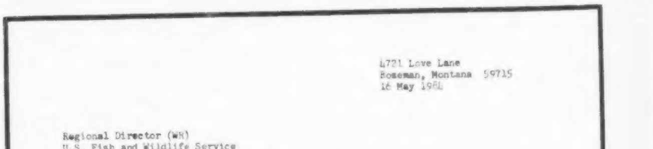
I am writing in support of the proposed goal for the CMR I believe a wildlife refuge should be managed as a wildlife refuge not a cattle refuge. I am in favor of some cattle grazing but should be regulated in favor of wildlife. As far as the Cabins are Concerned I dont think they are any trouble at all. No more sites should be Considered though I hope CMR remains a public hunting refuge and Not a non Huntable refuge.

thank You
Steve Schindler
Concerned
Sportsman

P.S.
I was at the EIS hearing in Glasgow and wanted to testify but I forgot My Brass Knuckles and felt somewhat alone

STEVE SCHINDLER
831 3rd AVE SO.
GLASGOW, MONTANA
59230

Steve Schindler
831 3rd Ave So
GLASGOW, MT
59230


4721 Love Lane
Bozeman, Montana 59715
16 May 1984

Regional Director (WR)
U.S. Fish and Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, Colorado 80225

Dear Sir:

We have just reviewed the Draft Environmental Impact Statement on Management of the Charles M. Russell National Wildlife Refuge (CMR). Because we make 2-3 trips annually to camp and hunt on and near the CMR we are very interested in the management of the CMR, especially as it affects wildlife and its habitat.

In light of political reality and the Ninth Circuit Court of Appeals ruling that wildlife has priority over livestock on the CMR, we believe the only viable alternatives are B (proposed action), C (intensive wildlife management), or some combination of items from each of these 2 alternatives. Other points or comments we wish to make concerning future management on the CMR are outlined below.

- Livestock AUM's should be reduced to at least the level (40,482) proposed in Alternative B.

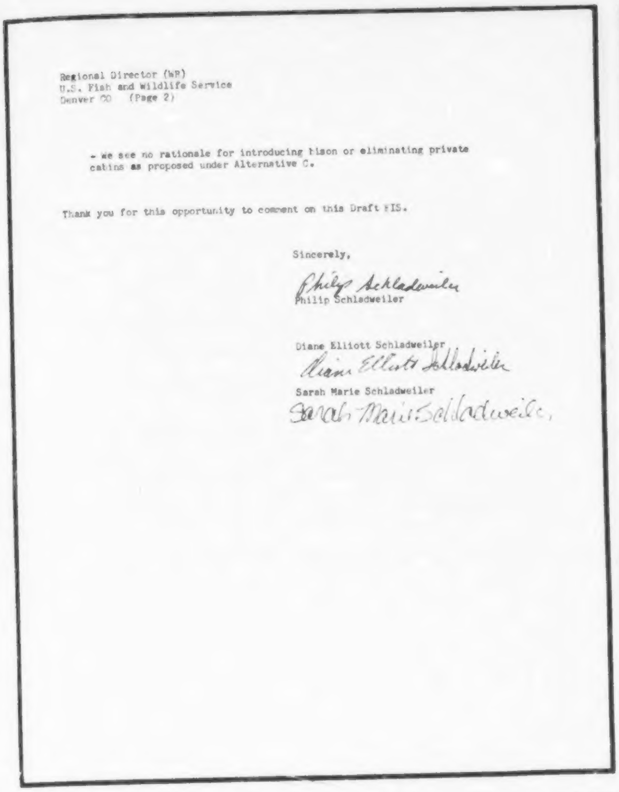
- Livestock management practices or facilities (i.e. stockponds) which tend to concentrate livestock use and cause local habitat deterioration should not be allowed.

- The CMR should definitely remain open to hunting and fishing.

- All existing roads and trails should remain open to vehicle travel.

- Insofar as possible, management should take into consideration all native wildlife. With this in mind, management should maintain vegetation in as near a natural state as possible.

- We see no problem in allowing trapping of aquatic or semi-aquatic species such as beaver, muskrat, mink, and raccoon. However, terrestrial wildlife having valuable pelts (primarily coyote, fox, badger, bobcat, and possibly weasel and skunk on the CMR) are primarily taken in leghold traps or snares. Both methods are very nonselective, and take a large number of nontarget animals of many species. These could include reintroduced black-footed ferrets, and swift fox. The latter are notoriously susceptible to trapping. For these reasons we feel that trapping of terrestrial wildlife should not be allowed on the CMR.



Regional Director (WR)
U.S. Fish and Wildlife Service
Denver CO (Page 2)

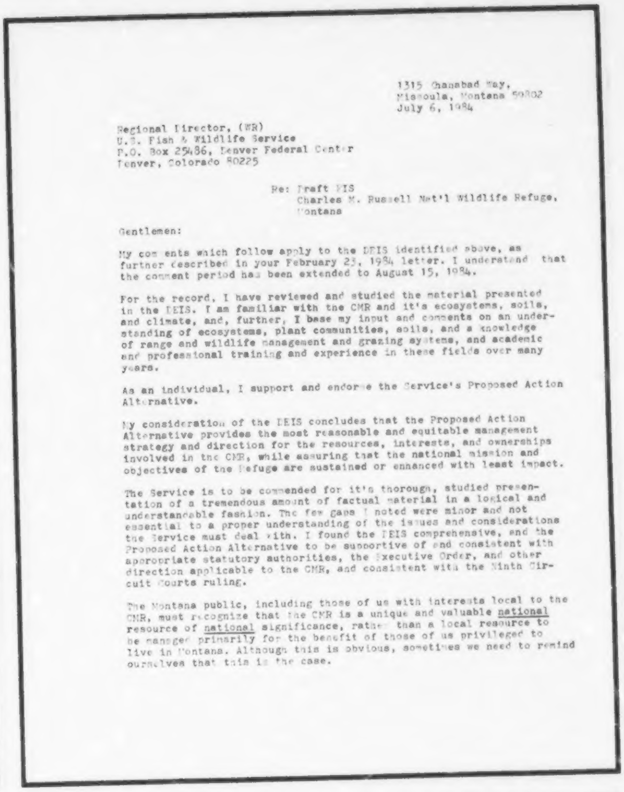
- we see no rationale for introducing bison or eliminating private cabins as proposed under Alternative C.

Thank you for this opportunity to comment on this Draft EIS.

Sincerely,

Philip Schladweiler
Philip Schladweiler

Diane Elliott Schladweiler
Diane Elliott Schladweiler
Sarah Marie Schladweiler
Sarah Marie Schladweiler



1315 Chanabad Way,
Missoula, Montana 59802
July 6, 1984

Regional Director, (WR)
U.S. Fish & Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, Colorado 80225

Re: Draft EIS
Charles M. Russell Nat'l Wildlife Refuge,
Montana

Gentlemen:

My comments which follow apply to the DEIS identified above, as further described in your February 23, 1984 letter. I understand that the comment period has been extended to August 15, 1984.

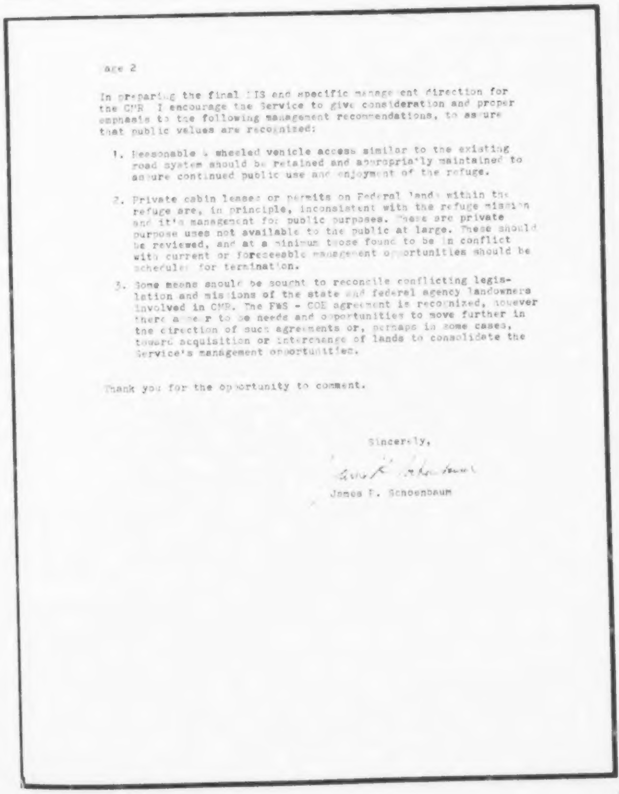
For the record, I have reviewed and studied the material presented in the DEIS. I am familiar with the CMR and it's ecosystems, soils, and climate, and, further, I base my input and comments on an understanding of ecosystems, plant communities, soils, and a knowledge of range and wildlife management and grazing systems, and academic and professional training and experience in these fields over many years.

As an individual, I support and endorse the Service's Proposed Action Alternative.

My consideration of the DEIS concludes that the Proposed Action Alternative provides the most reasonable and equitable management strategy and direction for the resources, interests, and ownerships involved in the CMR, while assuring that the national mission and objectives of the Refuge are sustained or enhanced with least impact.

The Service is to be commended for it's thorough, studied presentation of a tremendous amount of factual material in a logical and understandable fashion. The few gaps I noted were minor and not essential to a proper understanding of the issues and considerations the Service must deal with. I found the DEIS comprehensive, and the Proposed Action Alternative to be supportive of and consistent with appropriate statutory authorities, the Executive Order, and other direction applicable to the CMR, and consistent with the Ninth Circuit Courts ruling.

The Montana public, including those of us with interests local to the CMR, must recognize that the CMR is a unique and valuable national resource of national significance, rather than a local resource to be managed primarily for the benefit of those of us privileged to live in Montana. Although this is obvious, sometimes we need to remind ourselves that this is the case.



Page 2

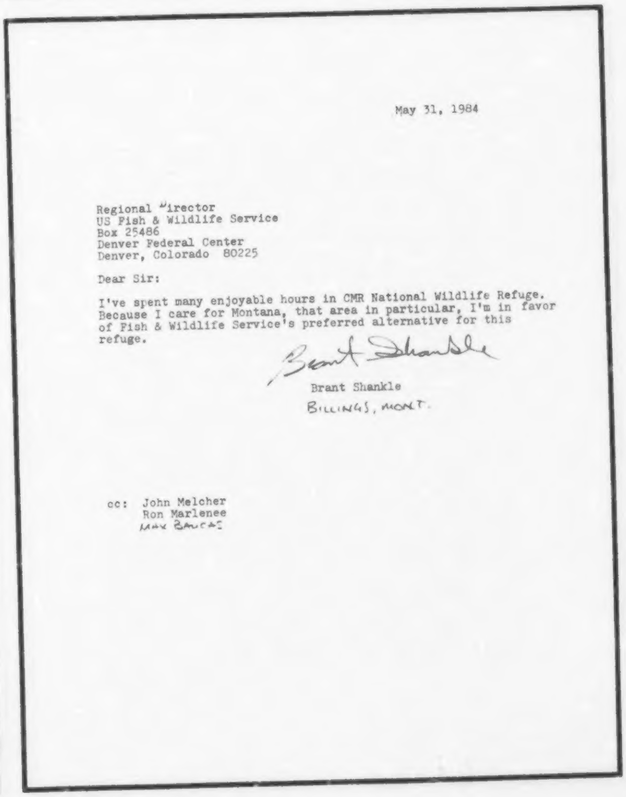
In preparing the final EIS and specific management direction for the CMR I encourage the Service to give consideration and proper emphasis to the following management recommendations, to assure that public values are recognized:

1. Reasonable 4 wheeled vehicle access similar to the existing road system should be retained and appropriately maintained to assure continued public use and enjoyment of the refuge.
2. Private cabin leases or permits on Federal lands within the refuge are, in principle, inconsistent with the refuge mission and it's management for public purposes. These are private purpose uses not available to the public at large. These should be reviewed, and at a minimum those found to be in conflict with current or foreseeable management opportunities should be scheduled for termination.
3. Some means should be sought to reconcile conflicting legislation and missions of the state and federal agency landowners involved in CMR. The FWS - COE agreement is recognized, however there appear to be needs and opportunities to move further in the direction of such agreements or, perhaps in some cases, toward acquisition or interchange of lands to consolidate the Service's management opportunities.

Thank you for the opportunity to comment.

Sincerely,

James F. Schoenbaum



May 31, 1984

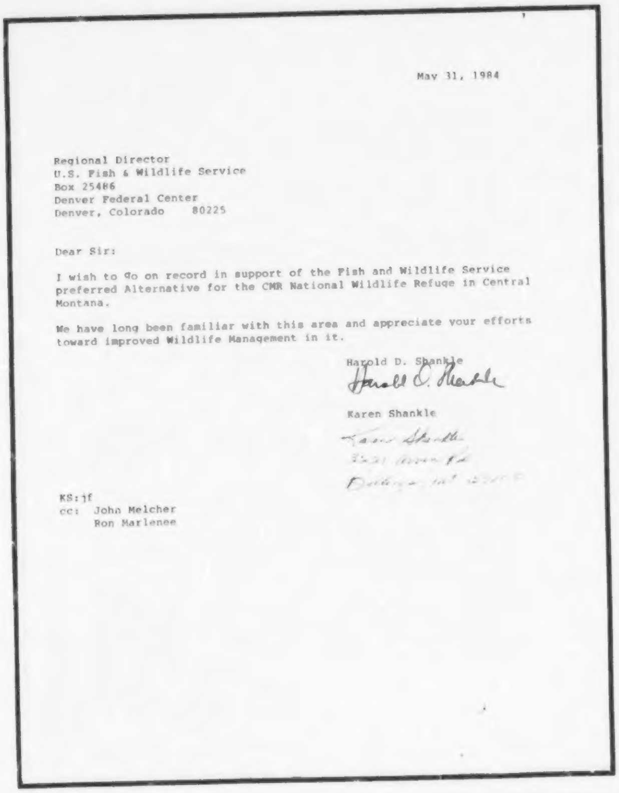
Regional Director
US Fish & Wildlife Service
Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Sir:

I've spent many enjoyable hours in CMR National Wildlife Refuge. Because I care for Montana, that area in particular, I'm in favor of Fish & Wildlife Service's preferred alternative for this refuge.

Brant Shankle
Brant Shankle
BILLINGS, MONT.

cc: John Melcher
Ron Marlenee
MAX BAUCAS



May 31, 1984

Regional Director
U.S. Fish & Wildlife Service
Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Sir:

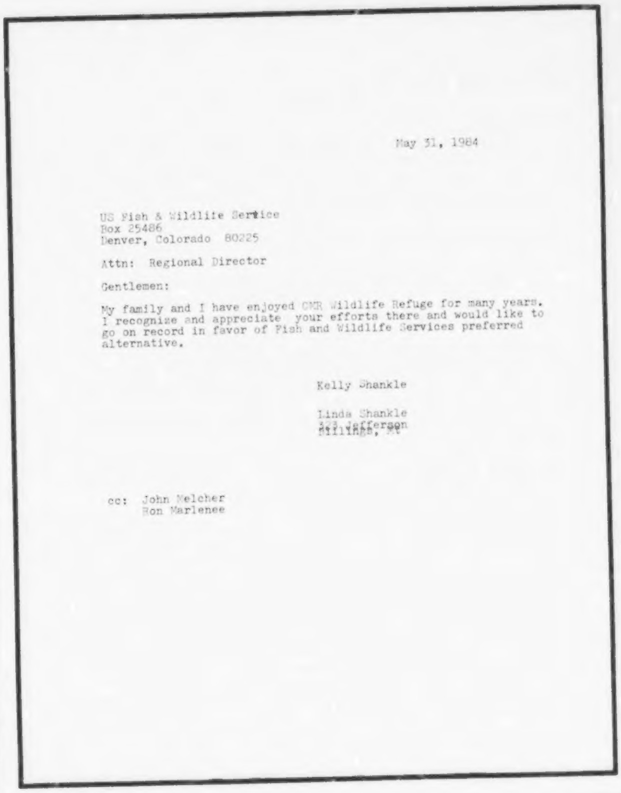
I wish to go on record in support of the Fish and Wildlife Service preferred Alternative for the CMR National Wildlife Refuge in Central Montana.

We have long been familiar with this area and appreciate your efforts toward improved Wildlife Management in it.

Harold D. Shankle
Harold D. Shankle

Karen Shankle
Karen Shankle
[illegible]
[illegible]

KS:jf
cc: John Melcher
Ron Marlenee



May 31, 1984

US Fish & Wildlife Service
Box 25486
Denver, Colorado 80225

Attn: Regional Director

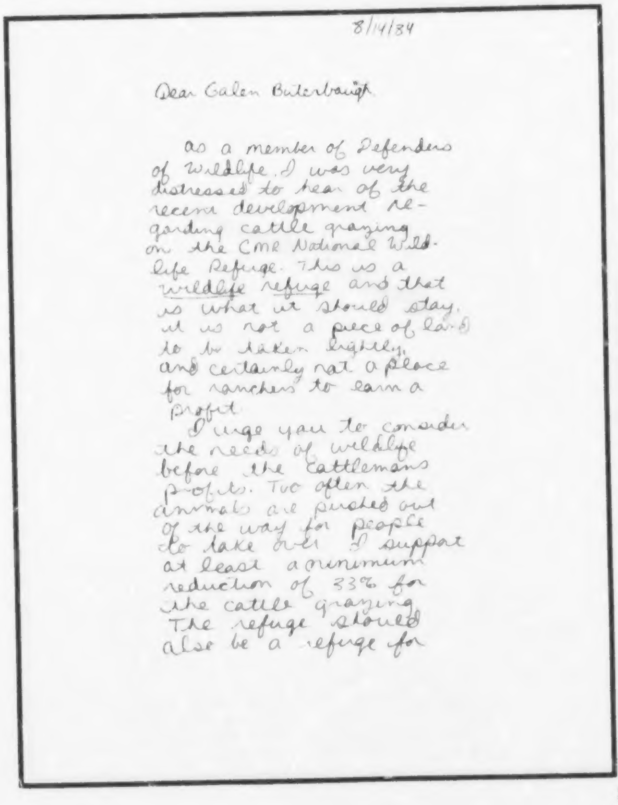
Gentlemen:

My family and I have enjoyed CMR Wildlife Refuge for many years. I recognize and appreciate your efforts there and would like to go on record in favor of Fish and Wildlife Services preferred alternative.

Kelly Shankle

Linda Shankle
323 Jefferson
Billings, Mt

cc: John Melcher
Ron Marlenee

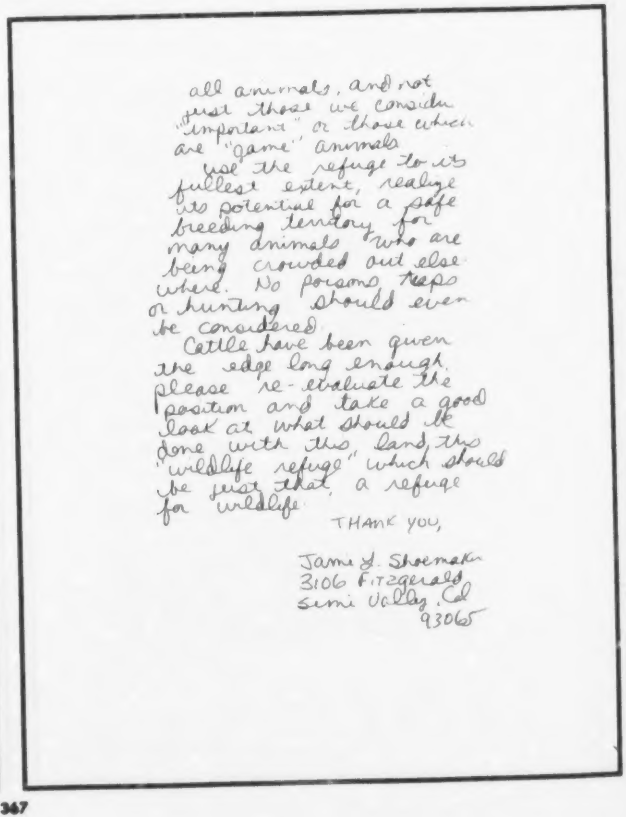


8/14/84

Dear Galen Buterbaugh

As a member of Defenders of Wildlife I was very distressed to hear of the recent development regarding cattle grazing on the CMR National Wildlife Refuge. This is a wildlife refuge and that is what it should stay. It is not a piece of land to be taken lightly, and certainly not a place for ranchers to earn a profit.

I urge you to consider the needs of wildlife before the cattlemans profits. Too often the animals are pushed out of the way for people to take over. I support at least a minimum reduction of 33% for the cattle grazing. The refuge should also be a refuge for



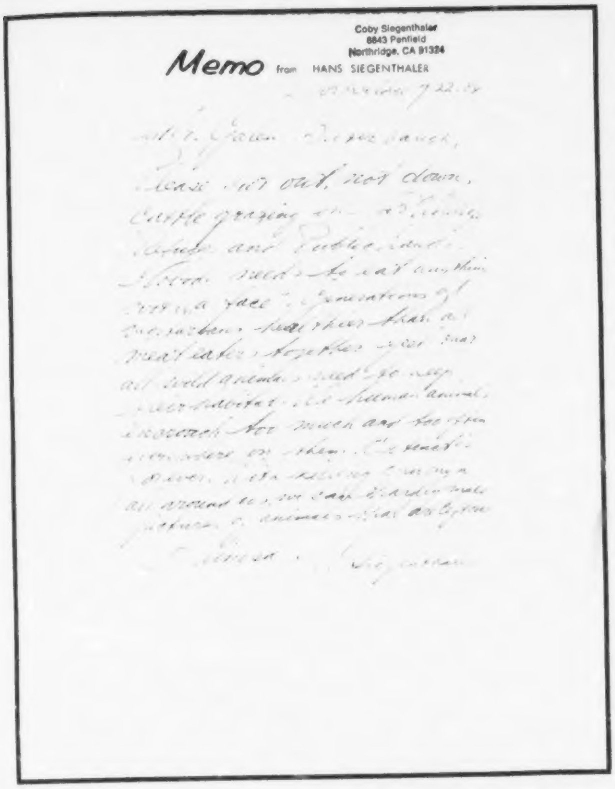
all animals, and not just those we consider "important" or those which are "game" animals.

Use the refuge to its fullest extent, realize its potential for a safe breeding territory for many animals who are being crowded out elsewhere. No poisons, traps or hunting should even be considered.

Cattle have been given the edge long enough. Please re-evaluate the position and take a good look at what should be done with this land, this "wildlife refuge" which should be just that, a refuge for wildlife.

THANK YOU,

Jamie L. Shoemaker
3106 Fitzgerald
Simi Valley, Cal
93065



Coby Siegenthaler
8843 Penfield
Northridge, CA 91324

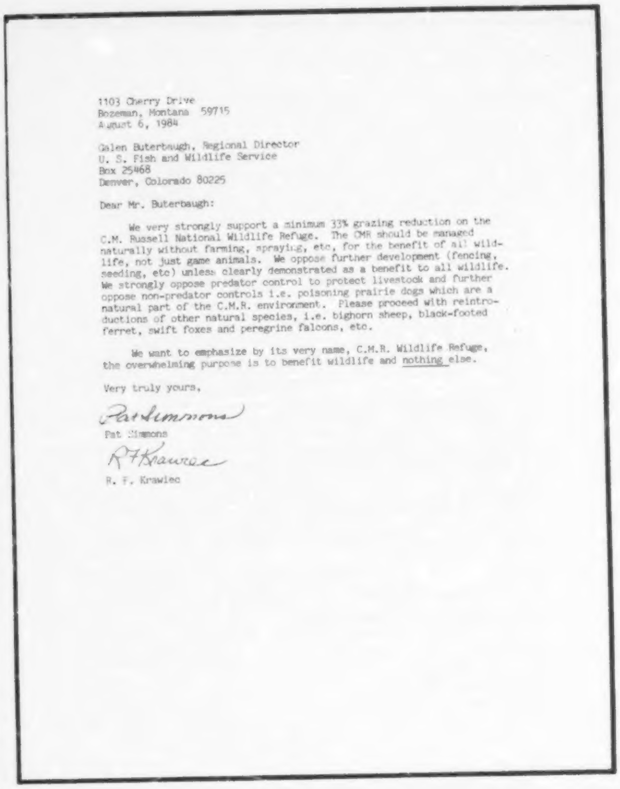
Memo from HANS SIEGENTHALER

Northridge 7.22.84

Mr. Galen Buterbaugh,

Please put out, not down,
cattle grazing on all Refuges
and Public Lands.
Nobody needs to eat anything
with a face. Generations of
vegetarians have shown that all
meat eaters together [illegible]
all wild animals need to keep
their habitat. We human animals
encroach too much and too often
everywhere on them. [illegible]
[illegible]
all around us, we can hardly make
pictures of animals that are gone.

[illegible] Siegenthaler



1103 Cherry Drive
Bozeman, Montana 59715
August 6, 1984

Galen Buterbaugh, Regional Director
U. S. Fish and Wildlife Service
Box 25486
Denver, Colorado 80225

Dear Mr. Buterbaugh:

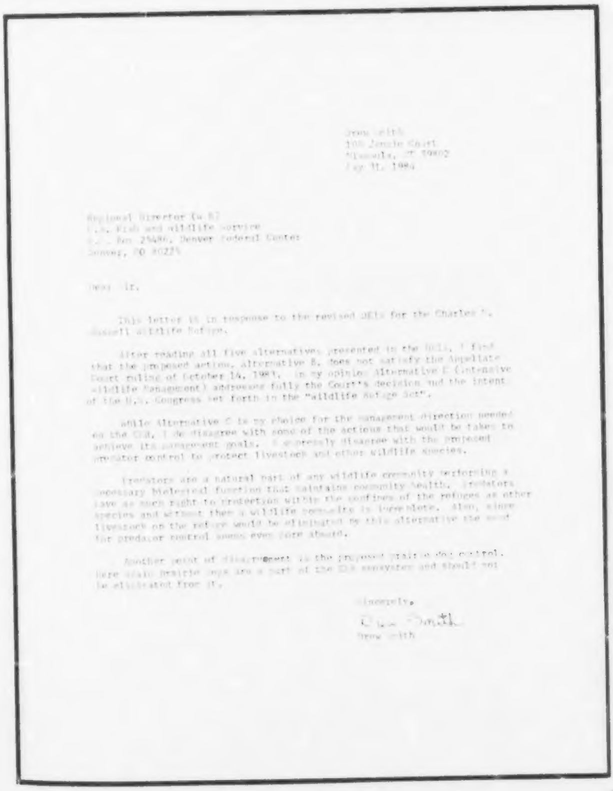
We very strongly support a minimum 33% grazing reduction on the C.M. Russell National Wildlife Refuge. The CMR should be managed naturally without farming, spraying, etc, for the benefit of all wildlife, not just game animals. We oppose further development (fencing, seeding, etc) unless clearly demonstrated as a benefit to all wildlife. We strongly oppose predator control to protect livestock and further oppose non-predator controls i.e. poisoning prairie dogs which are a natural part of the C.M.R. environment. Please proceed with reintroductions of other natural species, i.e. bighorn sheep, black-footed ferret, swift foxes and peregrine falcons, etc.

We want to emphasize by its very name, C.M.R. Wildlife Refuge, the overwhelming purpose is to benefit wildlife and nothing else.

Very truly yours,

Pat Simmons
Pat Simmons

R F Krawiec
R. F. Krawiec



Drew Smith
108 [illegible]
Missoula, MT 59802
July 31, 1984

Regional Director (W.R.)
U.S. Fish and Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, CO 80225

Dear Sir,

This letter is in response to the revised DEIS for the Charles M. Russell Wildlife Refuge.

After reading all five alternatives presented in the DEIS, I find that the proposed action, Alternative B, does not satisfy the Appellate Court ruling of October 14, 1983. In my opinion Alternative C (Intensive Wildlife Management) addresses fully the Court's decision and the intent of the U.S. Congress set forth in the "Wildlife Refuge Act".

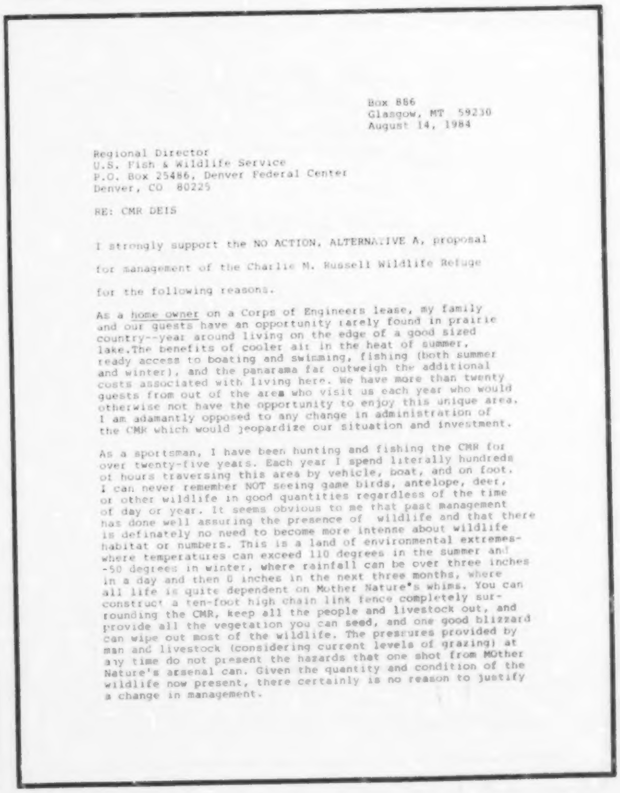
While Alternative C is my choice for the management direction needed on the CMR, I do disagree with some of the actions that would be taken to achieve its management goals. I expressly disagree with the proposed predator control to protect livestock and other wildlife species.

Predators are a natural part of any wildlife community performing a necessary biological function that maintains community health. Predators have as much right to protection within the confines of the refuges as other species and without them a wildlife community is incomplete. Also, since livestock on the refuge would be eliminated by this alternative the need for predator control seems even more absurd.

Another point of disagreement is the proposed prairie dog control. Here again prairie dogs are a part of the CMR ecosystem and should not be eliminated from it.

Sincerely,

Drew Smith
Drew Smith



Box 886
Glasgow, MT 59230
August 14, 1984

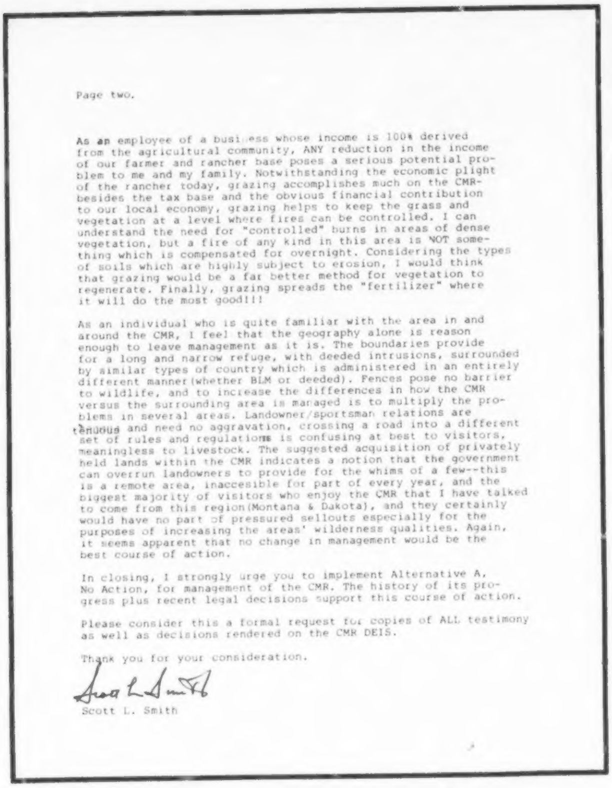
Regional Director
U.S. Fish & Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, CO 80225

RE: CMR DEIS

I strongly support the NO ACTION, ALTERNATIVE A, proposal for management of the Charlie M. Russell Wildlife Refuge for the following reasons.

As a home owner on a Corps of Engineers lease, my family and our guests have an opportunity rarely found in prairie country--year around living on the edge of a good sized lake.The benefits of cooler air in the heat of summer, ready access to boating and swimming, fishing (both summer and winter), and the panarama far outweigh the additional costs associated with living here. We have more than twenty guests from out of the area who visit us each year who would otherwise not have the opportunity to enjoy this unique area. I am adamantly opposed to any change in administration of the CMR which would jeopardize our situation and investment.

As a sportsman, I have been hunting and fishing the CMR for over twenty-five years. Each year I spend literally hundreds of hours traversing this area by vehicle, boat, and on foot. I can never remember NOT seeing game birds, antelope, deer, or other wildlife in good quantities regardless of the time of day or year. It seems obvious to me that past management has done well assuring the presence of wildlife and that there is definately no need to become more intense about wildlife habitat or numbers. This is a land of environmental extremes-where temperatures can exceed 110 degrees in the summer and -50 degrees in winter, where rainfall can be over three inches in a day and then 0 inches in the next three months, where all life is quite dependent on Mother Nature's whims. You can construct a ten-foot high chain link fence completely surrounding the CMR, keep all the people and livestock out, and provide all the vegetation you can seed, and one good blizzard can wipe out most of the wildlife. The pressures provided by man and livestock (considering current levels of grazing) at any time do not present the hazards that one shot from MOther Nature's arsenal can. Given the quantity and condition of the wildlife now present, there certainly is no reason to justify a change in management.



Page two.

As an employee of a business whose income is 100% derived from the agricultural community, ANY reduction in the income of our farmer and rancher base poses a serious potential problem to me and my family. Notwithstanding the economic plight of the rancher today, grazing accomplishes much on the CMR-besides the tax base and the obvious financial contribution to our local economy, grazing helps to keep the grass and vegetation at a level where fires can be controlled. I can understand the need for "controlled" burns in areas of dense vegetation, but a fire of any kind in this area is NOT something which is compensated for overnight. Considering the types of soils which are highly subject to erosion, I would think that grazing would be a far better method for vegetation to regenerate. Finally, grazing spreads the "fertilizer" where it will do the most good!!!

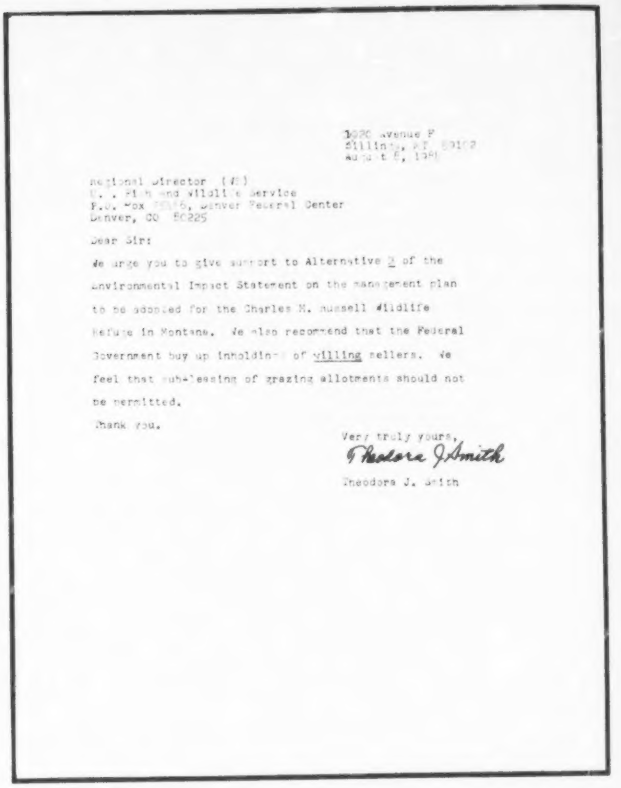
As an individual who is quite familiar with the area in and around the CMR, I feel that the geography alone is reason enough to leave management as it is. The boundaries provide for a long and narrow refuge, with deeded intrusions, surrounded by similar types of country which is administered in an entirely different manner(whether BLM or deeded). Fences pose no barrier to wildlife, and to increase the differences in how the CMR versus the surrounding area is managed is to multiply the problems in several areas. Landowner/sportsman relations are tenuous and need no aggravation, crossing a road into a different set of rules and regulations is confusing at best to visitors, meaningless to livestock. The suggested acquisition of privately held lands within the CMR indicates a notion that the government can overrun landowners to provide for the whims of a few--this is a remote area, inaccesible for part of every year, and the biggest majority of visitors who enjoy the CMR that I have talked to come from this region(Montana & Dakota), and they certainly would have no part of pressured sellouts especially for the purposes of increasing the areas' wilderness qualities. Again, it seems apparent that no change in management would be the best course of action.

In closing, I strongly urge you to implement Alternative A, No Action, for management of the CMR. The history of its progress plus recent legal decisions support this course of action.

Please consider this a formal request for copies of ALL testimony as well as decisions rendered on the CMR DEIS.

Thank you for your consideration.

Scott L. Smith



1020 Avenue F
Billings, MT 59102
August 6, 1984

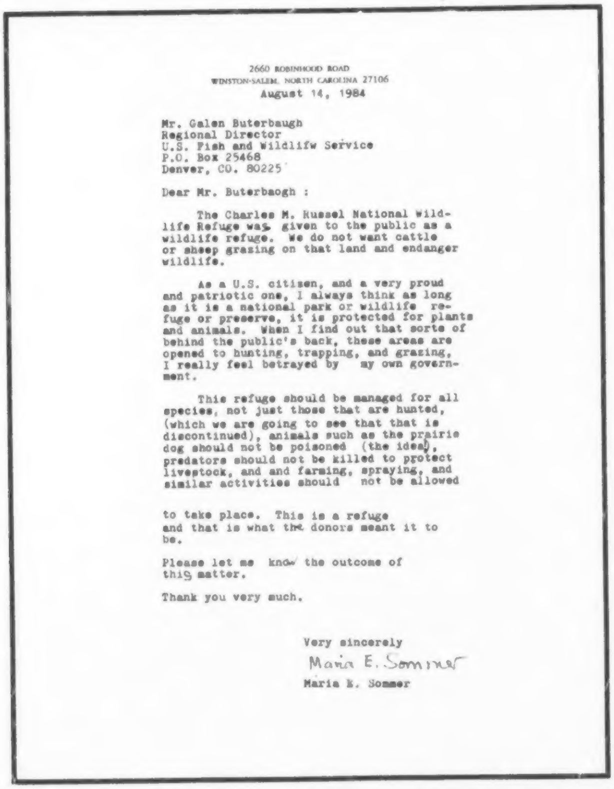
Regional Director (WS)
U.S. Fish and Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, CO 80225

Dear Sir:

We urge you to give support to Alternative B of the Environmental Impact Statement on the management plan to be adopted for the Charles M. Russell Wildlife Refuge in Montana. We also recommend that the Federal Government buy up inholdings of willing sellers. We feel that sub-leasing of grazing allotments should not be permitted.

Thank you.

Very truly yours,
Theodora J Smith
Theodora J. Smith



2660 ROBINHOOD ROAD
WINSTON-SALEM, NORTH CAROLINA 27106
August 14, 1984

Mr. Galen Buterbaugh
Regional Director
U.S. Fish and Wildlifw Service
P.O. Box 25468
Denver, CO. 80225

Dear Mr. Buterbaogh :

The Charles M. Russel National Wildlife Refuge was given to the public as a wildlife refuge. We do not want cattle or sheep grazing on that land and endanger wildlife.

As a U.S. citizen, and a very proud and patriotic one, I always think as long as it is a national park or wildlife refuge or preserve, it is protected for plants and animals. When I find out that sorts of behind the public's back, these areas are opened to hunting, trapping, and grazing, I really feel betrayed by my own government.

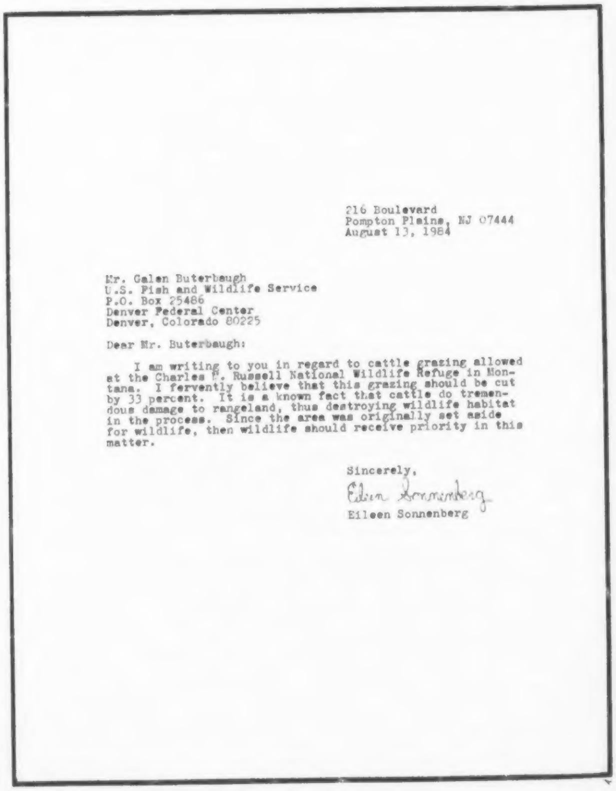
This refuge should be managed for all species, not just those that are hunted, (which we are going to see that that is discontinued), animals such as the prairie dog should not be poisoned (the idea), predators should not be killed to protect livestock, and and farming, spraying, and similar activities should not be allowed

to take place. This is a refuge and that is what the donors meant it to be.

Please let me know the outcome of this matter.

Thank you very much.

Very sincerely
Maria E. Sommer
Maria E. Sommer



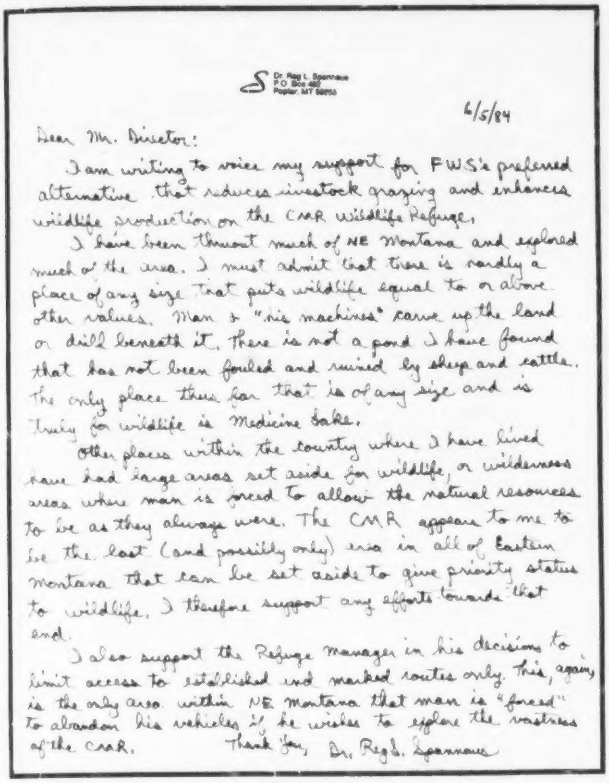
216 Boulevard
Pompton Plains, NJ 07444
August 13, 1984

Mr. Galen Buterbaugh
U.S. Fish and Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Mr. Buterbaugh:

I am writing to you in regard to cattle grazing allowed at the Charles M. Russell National Wildlife Refuge in Montana. I fervently believe that this grazing should be cut by 33 percent. It is a known fact that cattle do tremendous damage to rangeland, thus destroying wildlife habitat in the process. Since the area was originally set aside for wildlife, then wildlife should receive priority in this matter.

Sincerely,
Eileen Sonnenberg
Eileen Sonnenberg



Dr. Reg L. Spannaus
P.O. Box [illegible]
Poplar, MT 59255

6/5/84

Dear Mr. Director:

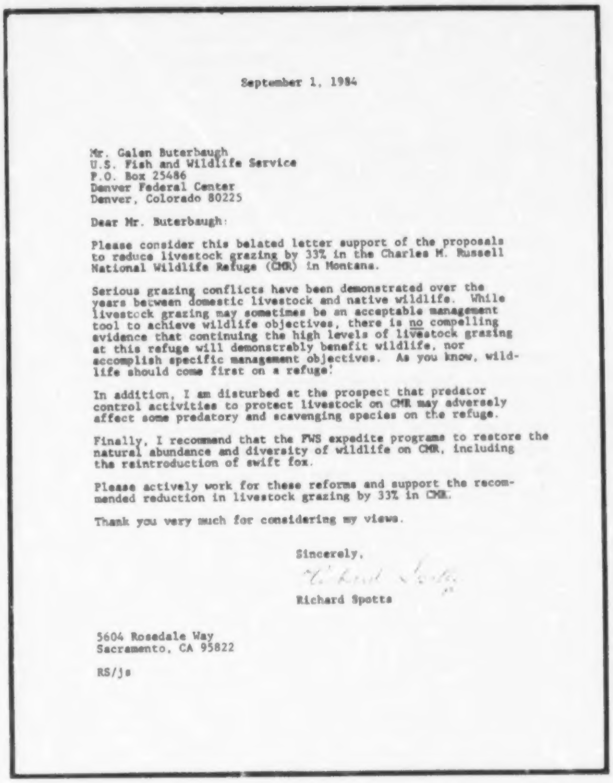
I am writing to voice my support for FWS's preferred alternative that reduces livestock grazing and enhances wildlife production on the CMR Wildlife Refuge.

I have been thruout much of NE Montana and explored much of the area. I must admit that there is hardly a place of any size that puts wildlife equal to or above other values. Man & "his machines" carve up the land or drill beneath it. There is not a pond I have found that has not been fouled and ruined by sheep and cattle. The only place thus far that is of any size and is truly for wildlife is Medicine Lake.

Other places within the country where I have lived have had large areas set aside for wildlife, or wilderness areas where man is forced to allow the natural resources to be as they always were. The CMR appears to me to be the last (and possibly only) area in all of Eastern Montana that can be set aside to give priority status to wildlife. I therefore support any efforts towards that end.

I also support the Refuge manager in his decisions to limit access to established and marked routes only. This, again, is the only area within NE Montana that man is "forced" to abandon his vehicles if he wishes to explore the vastness of the CMR.

Thank You, Dr. Reg L. Spannaus



September 1, 1984

Mr. Galen Buterbaugh
U.S. Fish and Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Mr. Buterbaugh:

Please consider this belated letter support of the proposals to reduce livestock grazing by 33% in the Charles M. Russell National Wildlife Refuge (CMR) in Montana.

Serious grazing conflicts have been demonstrated over the years between domestic livestock and native wildlife. While livestock grazing may sometimes be an acceptable management tool to achieve wildlife objectives, there is no compelling evidence that continuing the high levels of livestock grazing at this refuge will demonstrably benefit wildlife, nor accomplish specific management objectives. As you know, wildlife should come first on a refuge!

In addition, I am disturbed at the prospect that predator control activities to protect livestock on CMR may adversely affect some predatory and scavenging species on the refuge.

Finally, I recommend that the FWS expedite programs to restore the natural abundance and diversity of wildlife on CMR, including the reintroduction of swift fox.

Please actively work for these reforms and support the recommended reduction in livestock grazing by 33% in CMR.

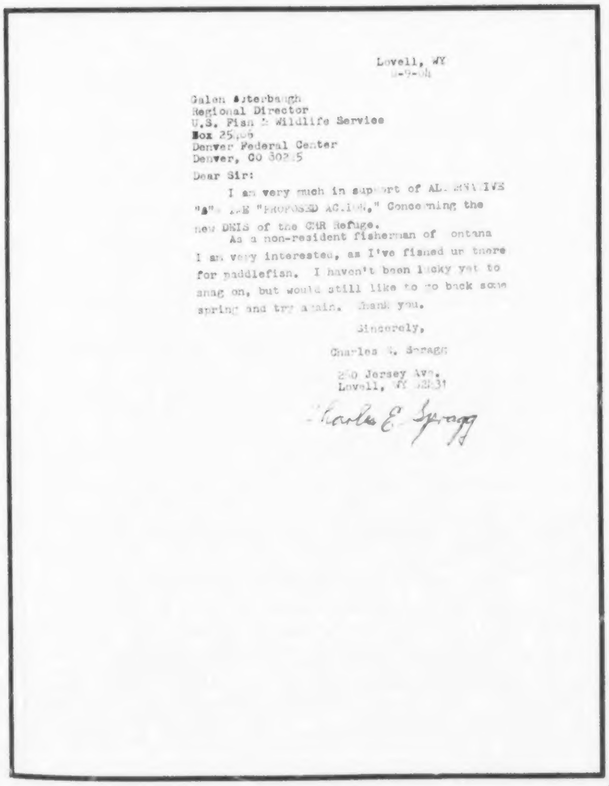
Thank you very much for considering my views.

Sincerely,

Richard Spotts

5604 Rosedale Way
Sacramento, CA 95822

RS/js



Lovell, WY
[illegible]-9-84

Galen Buterbaugh
Regional Director
U.S. Fish & Wildlife Service
Box 25[illegible]6
Denver Federal Center
Denver, CO 80225

Dear Sir:

I am very much in support of ALTERNATIVE "A" THE "PROPOSED ACTION," Concerning the new DEIS of the CMR Refuge.

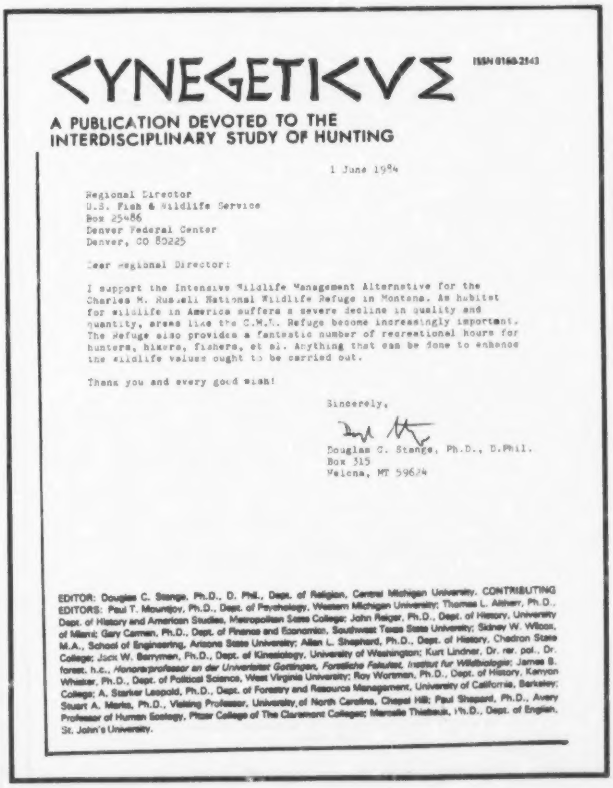
As a non-resident fisherman of Montana I am very interested, as I've fished up there for paddlefish. I haven't been lucky yet to snag on, but would still like to go back some spring and try again. Thank you.

Sincerely,

Charles E. Spragg

250 Jersey Ave.
Lovell, WY 82431

Charles E. Spragg



CYNEGETICVS

A PUBLICATION DEVOTED TO THE INTERDISCIPLINARY STUDY OF HUNTING

ISSN 0160-2143

1 June 1984

Regional Director
U.S. Fish & Wildlife Service
Box 25486
Denver Federal Center
Denver, CO 80225

Dear Regional Director:

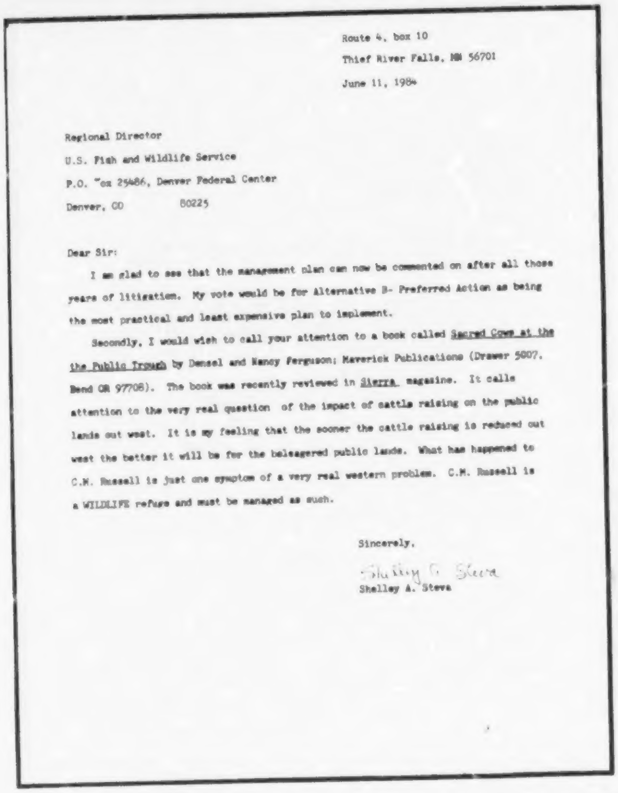
I support the Intensive Wildlife Management Alternative for the Charles M. Russell National Wildlife Refuge in Montana. As habitat for wildlife in America suffers a severe decline in quality and quantity, areas like the C.M.R. Refuge become increasingly important. The Refuge also provides a fantastic number of recreational hours for hunters, hikers, fishers, et al. Anything that can be done to enhance the wildlife values ought to be carried out.

Thank you and every good wish!

Sincerely,

Douglas C. Stange, Ph.D., D.Phil.
Box 315
Helena, MT 59624

EDITOR: Douglas C. Stange, Ph.D., D. Phil., Dept. of Religion, Central Michigan University. CONTRIBUTING EDITORS: Paul T. Mountjoy, Ph.D., Dept. of Psychology, Western Michigan University; Thomas L. Altherr, Ph.D., Dept. of History and American Studies, Metropolitan State College; John Reiger, Ph.D., Dept. of History, University of Miami; Gary Carmen, Ph.D., Dept. of Finance and Economics, Southwest Texas State University; Sidney W. Wilcox, M.A., School of Engineering, Arizona State University; Allen L. Shepherd, Ph.D., Dept. of History, Chadron State College; Jack W. Berryman, Ph.D., Dept. of Kinesiology, University of Washington; Kurt Lindner, Dr. rer. pol., Dr. forest. h.c., *Honorarprofessor an der Universitat Gottingen, Forstliche Fakultat, Institut fur Wildbiologie*; James B. Whisker, Ph.D., Dept. of Political Science, West Virginia University; Roy Wortman, Ph.D., Dept. of History, Kenyon College; A. Starker Leopold, Ph.D., Dept. of Forestry and Resource Management, University of California, Berkeley; Stuart A. Marks, Ph.D., Visiting Professor, University of North Carolina, Chapel Hill; Paul Shepard, Ph.D., Avery Professor of Human Ecology, Pitzer College of The Claremont Colleges; Marcelle Thiebaux, Ph.D., Dept. of English, St. John's University.



Route 4, box 10
Thief River Falls, MN 56701
June 11, 1984

Regional Director
U.S. Fish and Wildlife Service
P.O. "ox 25486, Denver Federal Center
Denver, CO 80225

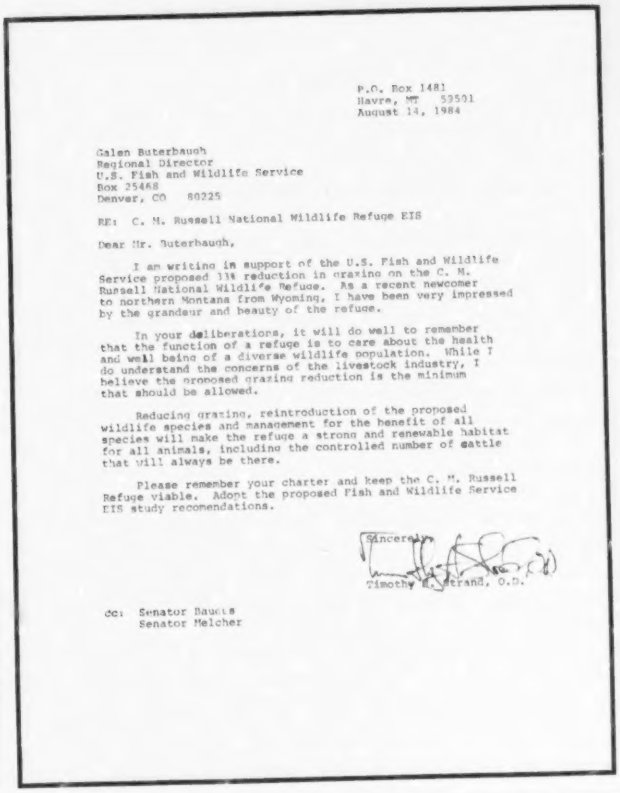
Dear Sir:

I am glad to see that the management plan can now be commented on after all those years of litigation. My vote would be for Alternative B- Preferred Action as being the most practical and least expensive plan to implement.

Secondly, I would wish to call your attention to a book called Sacred Cows at the the Public Trough by Densel and Nancy Ferguson; Maverick Publications (Drawer 5007, Bend OR 97708). The book was recently reviewed in Sierra magazine. It calls attention to the very real question of the impact of cattle raising on the public lands out west. It is my feeling that the sooner the cattle raising is reduced out west the better it will be for the beleagered public lands. What has happened to C.M. Russell is just one symptom of a very real western problem. C.M. Russell is a WILDLIFE refuge and must be managed as such.

Sincerely,

Shelley A. Steva
Shelley A. Steva



P.O. Box 1481
Havre, MT 59501
August 14, 1984

Galen Buterbaugh
Regional Director
U.S. Fish and Wildlife Service
Box 25468
Denver, CO 80225

RE: C. M. Russell National Wildlife Refuge EIS

Dear Mr. Buterbaugh,

I am writing in support of the U.S. Fish and Wildlife Service proposed 33% reduction in grazing on the C. M. Russell National Wildlife Refuge. As a recent newcomer to northern Montana from Wyoming, I have been very impressed by the grandeur and beauty of the refuge.

In your deliberations, it will do well to remember that the function of a refuge is to care about the health and well being of a diverse wildlife population. While I do understand the concerns of the livestock industry, I believe the proposed grazing reduction is the minimum that should be allowed.

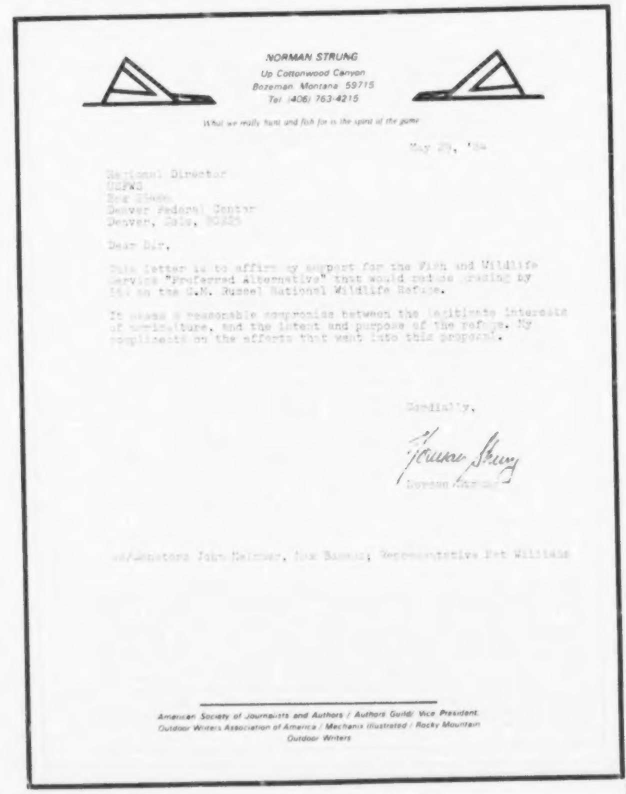
Reducing grazing, reintroduction of the proposed wildlife species and management for the benefit of all species will make the refuge a strong and renewable habitat for all animals, including the controlled number of cattle that will always be there.

Please remember your charter and keep the C. M. Russell Refuge viable. Adopt the proposed Fish and Wildlife Service EIS study recomendations.

Sincerely,

Timothy [illegible]. Strand, O.D.

cc: Senator Baucus
Senator Melcher



NORMAN STRUNG
Up Cottonwood Canyon
Bozeman, Montana 59715
Tel (406) 763-4215

What we really hunt and fish for is the spirit of the game

May 29, '84

Regional Director
USFWS
Box 25486
Denver Federal Center
Denver, Colo. 80225

Dear Sir,

This letter is to affirm my support for the Fish and Wildlife Service "Preferred Alternative" that would reduce grazing by 33% on the C.M. Russel National Wildlife Refuge.

It seems a reasonable compromise between the legitimate interests of agriculture, and the intent and purpose of the refuge. My compliments on the efforts that went into this proposal.

Cordially,

Norman Strung
Norman Strung

cc/Senators John Melcher, Max Baucus; Representative Pat Williams

American Society of Journalists and Authors / Authors Guild/ Vice President, Outdoor Writers Association of America / Mechanix Illustrated / Rocky Mountain Outdoor Writers

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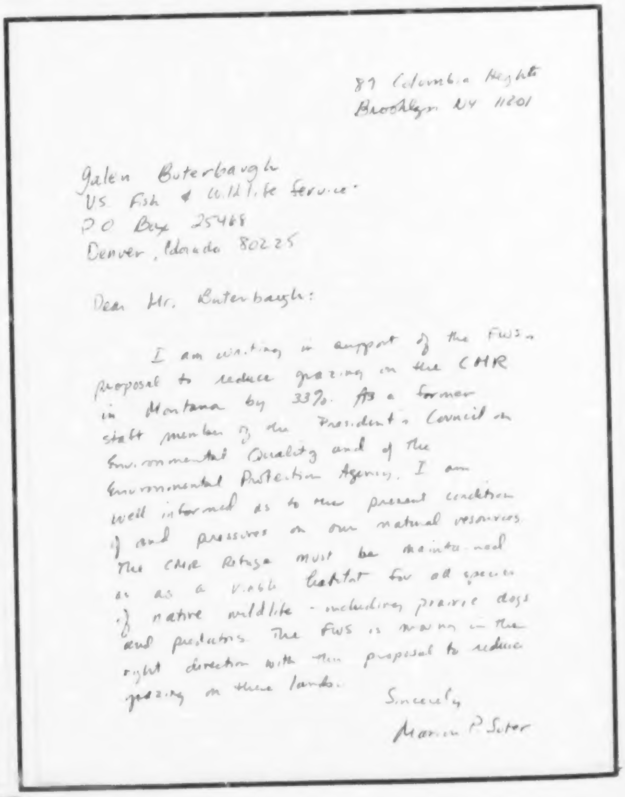


87 Columbia Heights
Brooklyn NY 11201

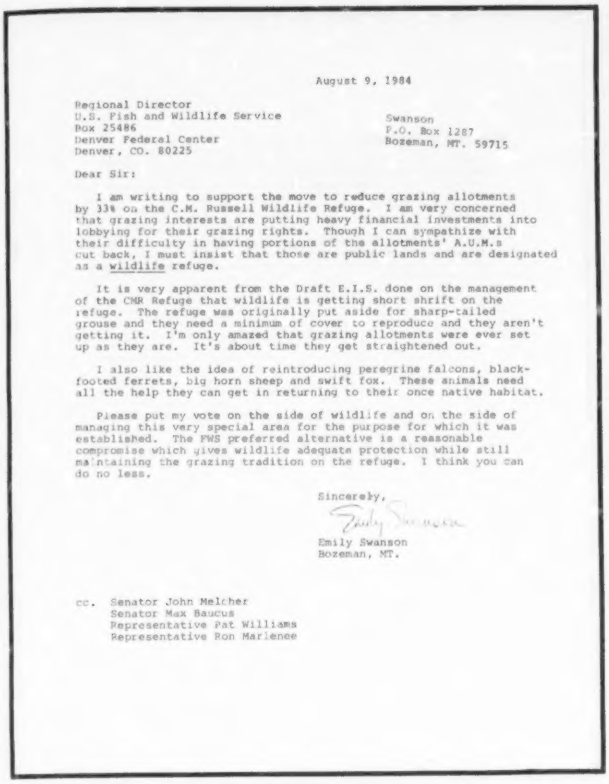
Galen Buterbaugh
US Fish & Wildlife Service
P O Box 25468
Denver, Colorado 80225

Dear Mr. Buterbaugh:

I am writing in support of the FWS's proposal to reduce grazing on the CMR in Montana by 33%. As a former staff member of the President's Council on Environmental Quality and of the Environmental Protection Agency, I am well informed as to the present condition of and pressures on our natural resources. The CMR Refuge must be maintained as a viable habitat for all species of native wildlife - including prairie dogs and predators. The FWS is moving in the right direction with this proposal to reduce grazing on these lands.

Sincerely

Marian P. Suter



August 9, 1984

Regional Director
U.S. Fish and Wildlife Service
Box 25486
Denver Federal Center
Denver, CO. 80225

Swanson
P.O. Box 1287
Bozeman, MT. 59715

Dear Sir:

I am writing to support the move to reduce grazing allotments by 33% on the C.M. Russell Wildlife Refuge. I am very concerned that grazing interests are putting heavy financial investments into lobbying for their grazing rights. Though I can sympathize with their difficulty in having portions of the allotments' A.U.M.s cut back, I must insist that those are public lands and are designated as a wildlife refuge.

It is very apparent from the Draft E.I.S. done on the management of the CMR Refuge that wildlife is getting short shrift on the refuge. The refuge was originally put aside for sharp-tailed grouse and they need a minimum of cover to reproduce and they aren't getting it. I'm only amazed that grazing allotments were ever set up as they are. It's about time they get straightened out.

I also like the idea of reintroducing peregrine falcons, black-footed ferrets, big horn sheep and swift fox. These animals need all the help they can get in returning to their once native habitat.

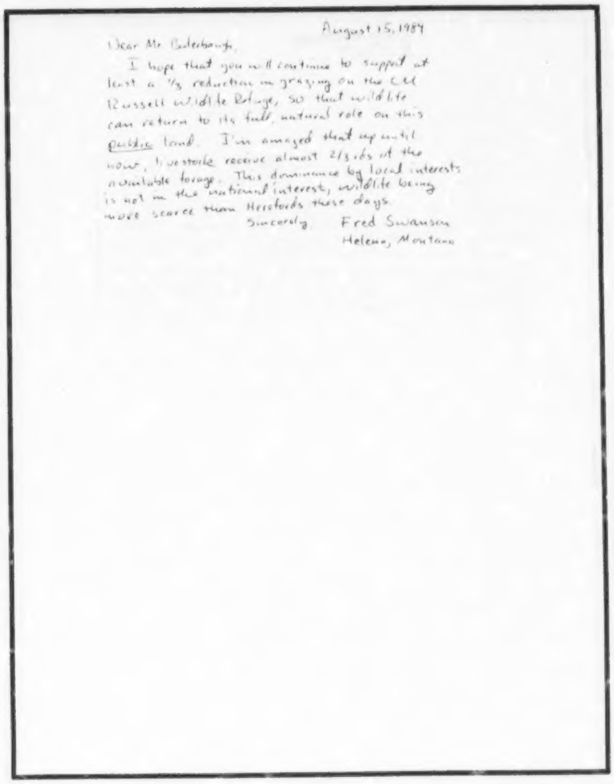
Please put my vote on the side of wildlife and on the side of managing this very special area for the purpose for which it was established. The FWS preferred alternative is a reasonable compromise which gives wildlife adequate protection while still maintaining the grazing tradition on the refuge. I think you can do no less.

Sincerely,

Emily Swanson

Emily Swanson
Bozeman, MT.

cc. Senator John Melcher
Senator Max Baucus
Representative Pat Williams
Representative Ron Marlenee

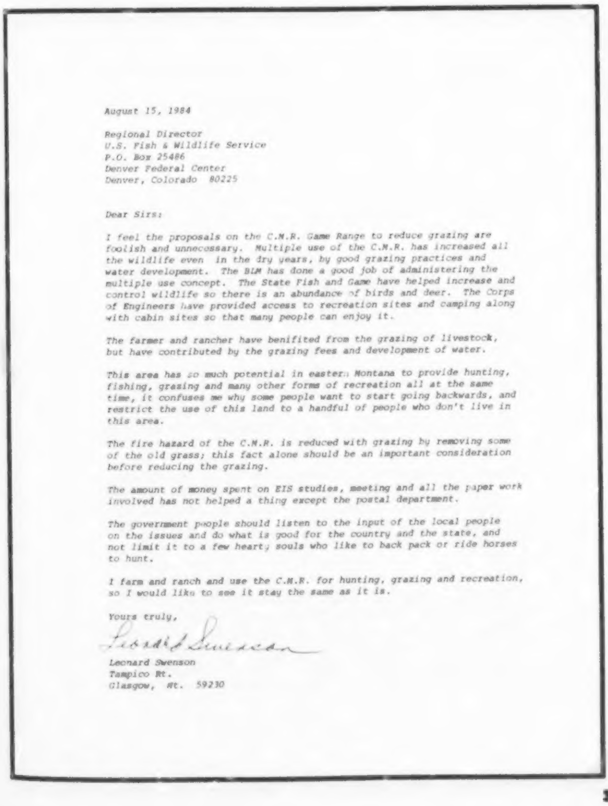


August 15, 1984

Dear Mr. Buterbaugh,

I hope that you will continue to support at least a 1/3 reduction in grazing on the C M Russell Wildlife Refuge, so that wildlife can return to its full, natural role on this public land. I'm amazed that up until now, livestock receive almost 2/3rds of the available forage. This dominance by local interests is not in the national interest, wildlife being more scarce than Herefords these days.

Sincerely
Fred Swanson
Helena, Montana



August 15, 1984

Regional Director
U.S. Fish & Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Sirs:

I feel the proposals on the C.M.R. Game Range to reduce grazing are foolish and unnecessary. Multiple use of the C.M.R. has increased all the wildlife even in the dry years, by good grazing practices and water development. The BLM has done a good job of administering the multiple use concept. The State Fish and Game have helped increase and control wildlife so there is an abundance of birds and deer. The Corps of Engineers have provided access to recreation sites and camping along with cabin sites so that many people can enjoy it.

The farmer and rancher have benifited from the grazing of livestock, but have contributed by the grazing fees and development of water.

This area has so much potential in eastern Montana to provide hunting, fishing, grazing and many other forms of recreation all at the same time, it confuses me why some people want to start going backwards, and restrict the use of this land to a handful of people who don't live in this area.

The fire hazard of the C.M.R. is reduced with grazing by removing some of the old grass; this fact alone should be an important consideration before reducing the grazing.

The amount of money spent on EIS studies, meeting and all the paper work involved has not helped a thing except the postal department.

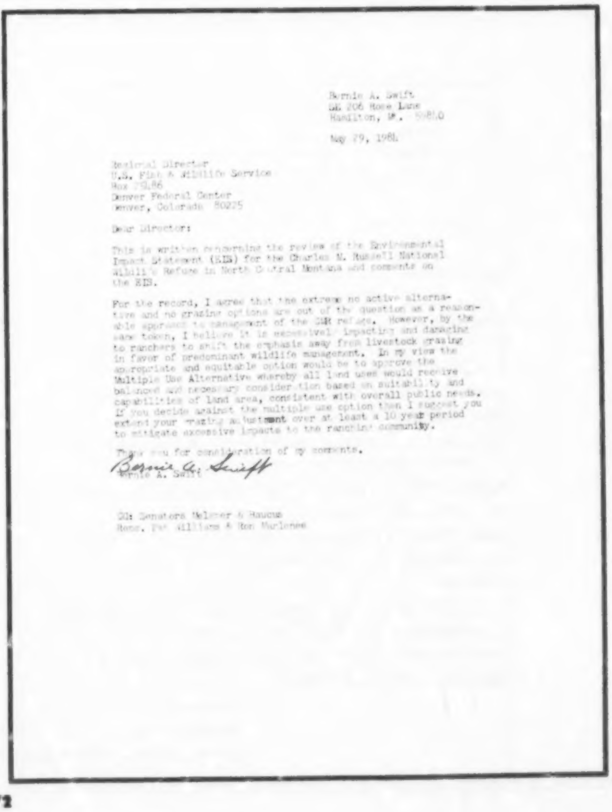
The government people should listen to the input of the local people on the issues and do what is good for the country and the state, and not limit it to a few hearty souls who like to back pack or ride horses to hunt.

I farm and ranch and use the C.M.R. for hunting, grazing and recreation, so I would like to see it stay the same as it is.

Yours truly,

Leonard Swenson

Leonard Swenson
Tampico Rt.
Glasgow, Mt. 59230



Bernie A. Swift
GE 206 Rose Lane
Hamilton, Mt. 59840

May 29, 1984

Regional Director
U.S. Fish & Wildlife Service
Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Director:

This is written concerning the review of the Environmental Impact Statement (EIS) for the Charles M. Russell National Wildlife Refuge in North Central Montana and comments on the EIS.

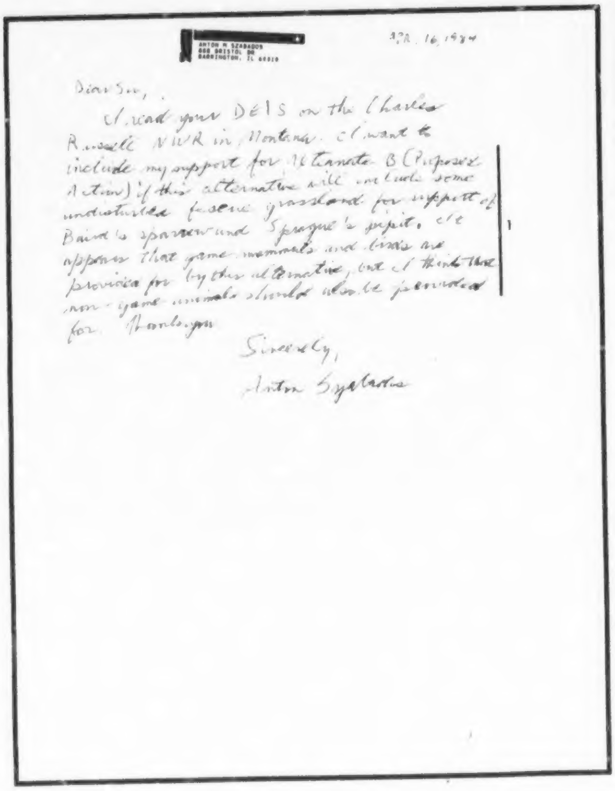
For the record, I agree that the extreme no active alternative and no grazing options are out of the question as a reasonable approach to management of the CMR refuge. However, by the same token, I believe it is excessively impacting and damaging to ranchers to shift the emphasis away from livestock grazing in favor of predominant wildlife management. In my view the appropriate and equitable option would be to approve the Multiple Use Alternative whereby all land uses would receive balanced and necessary consideration based on suitability and capabilities of land area, consistent with overall public needs. If you decide against the multiple use option then I suggest you extend your grazing adjustment over at least a 10 year period to mitigate excessive impacts to the ranching community.

Thank you for consideration of my comments.

Bernie A. Swift

Bernie A. Swift

CC: Senators Melcher & Baucus
Reps. Pat Williams & Ron Marlenee



[redacted]
ANTON M SZABADOS
888 BRISTOL DR
BARRINGTON, IL 60010

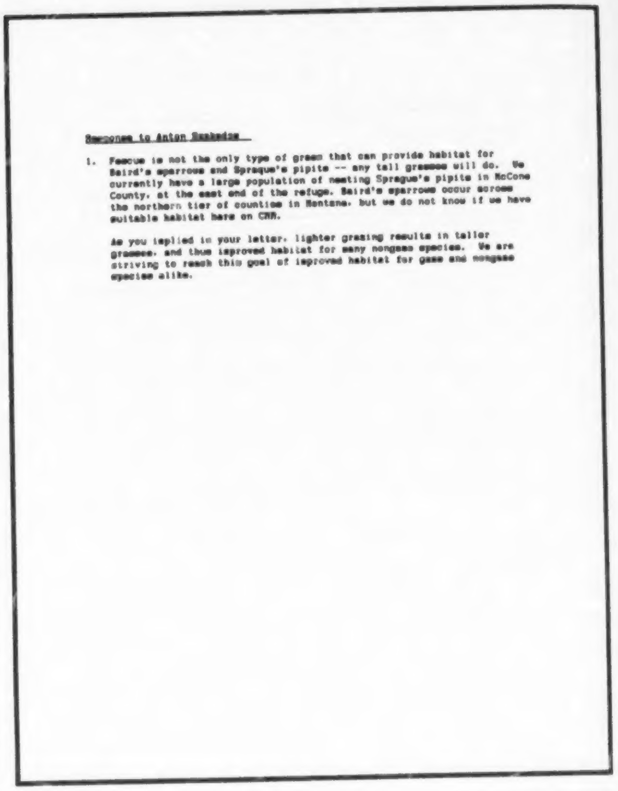
APR. 16, 1984

Dear Sir,

I read your DEIS on the Charles Russell NWR in Montana. I want to include my support for Alternate B (Proposed Action) if this alternative will include some undisturbed fescue grassland for support of Baird's sparrow and Sprague's pipit. It appears that game mammals and birds are provided for by this alternative, but I think that non-game animals should also be provided for. Thank you 1

Sincerely,

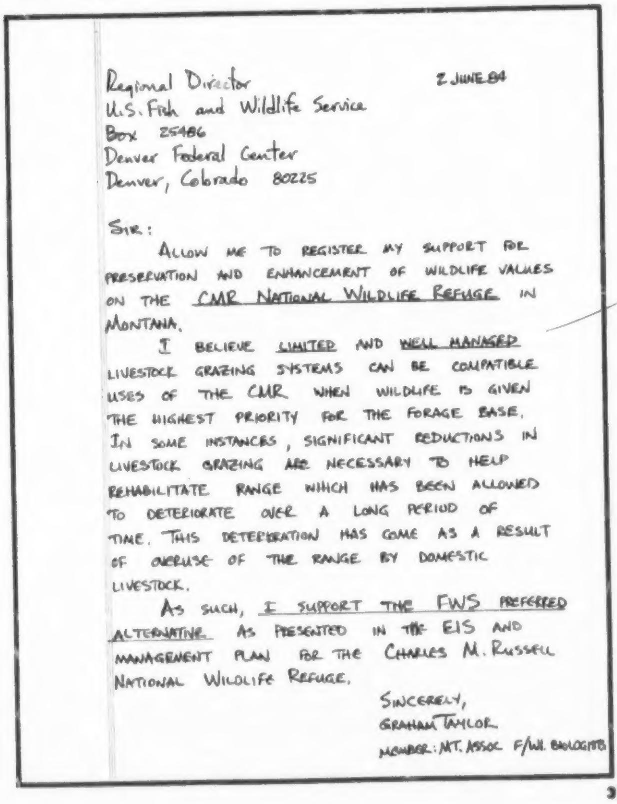
Anton Szabados



Response to Anton Szabados

1. Fescue is not the only type of grass that can provide habitat for Baird's sparrows and Sprague's pipits -- any tall grasses will do. We currently have a large population of nesting Sprague's pipits in McCone County, at the east end of the refuge. Baird's sparrows occur across the northern tier of counties in Montana, but we do not know if we have suitable habitat here on CMR.

   As you implied in your letter, lighter grazing results in taller grasses, and thus improved habitat for many nongame species. We are striving to reach this goal of improved habitat for game and nongame species alike.



Regional Director
U.S. Fish and Wildlife Service
Box 25486
Denver Federal Center
Denver, Colorado 80225

2 JUNE 84

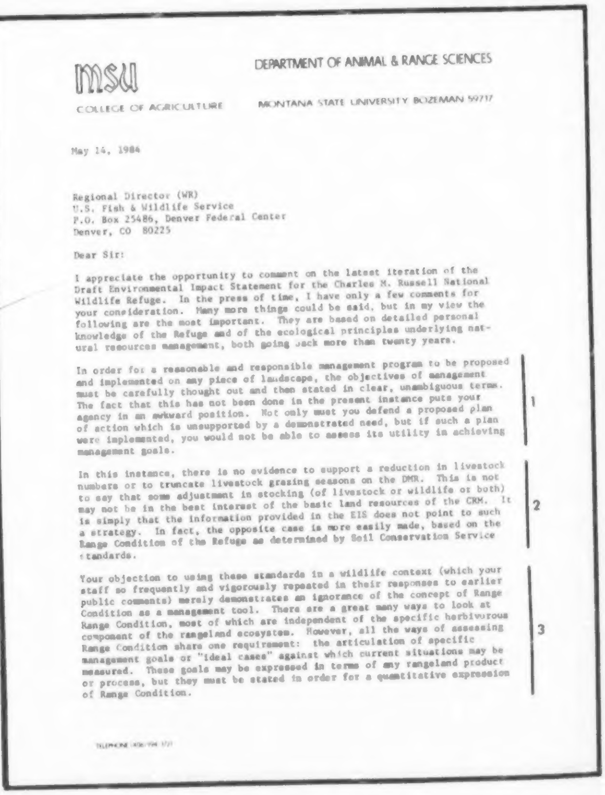
SIR:

ALLOW ME TO REGISTER MY SUPPORT FOR PRESERVATION AND ENHANCEMENT OF WILDLIFE VALUES ON THE CMR NATIONAL WILDLIFE REFUGE IN MONTANA.

I BELIEVE LIMITED AND WELL MANAGED LIVESTOCK GRAZING SYSTEMS CAN BE COMPATIBLE USES OF THE CMR WHEN WILDLIFE IS GIVEN THE HIGHEST PRIORITY FOR THE FORAGE BASE. IN SOME INSTANCES, SIGNIFICANT REDUCTIONS IN LIVESTOCK GRAZING ARE NECESSARY TO HELP REHABILITATE RANGE WHICH HAS BEEN ALLOWED TO DETERIORATE OVER A LONG PERIOD OF TIME. THIS DETERIORATION HAS COME AS A RESULT OF OVERUSE OF THE RANGE BY DOMESTIC LIVESTOCK.

AS SUCH, I SUPPORT THE FWS PREFERRED ALTERNATIVE AS PRESENTED IN THE EIS AND MANAGEMENT PLAN FOR THE CHARLES M. RUSSELL NATIONAL WILDLIFE REFUGE.

SINCERELY,
GRAHAM TAYLOR
MEMBER: MT. ASSOC F/WL BIOLOGISTS



msu
COLLEGE OF AGRICULTURE
DEPARTMENT OF ANIMAL & RANGE SCIENCES
MONTANA STATE UNIVERSITY BOZEMAN 59717

May 14, 1984

Regional Director (WR)
U.S. Fish & Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, CO 80225

Dear Sir:

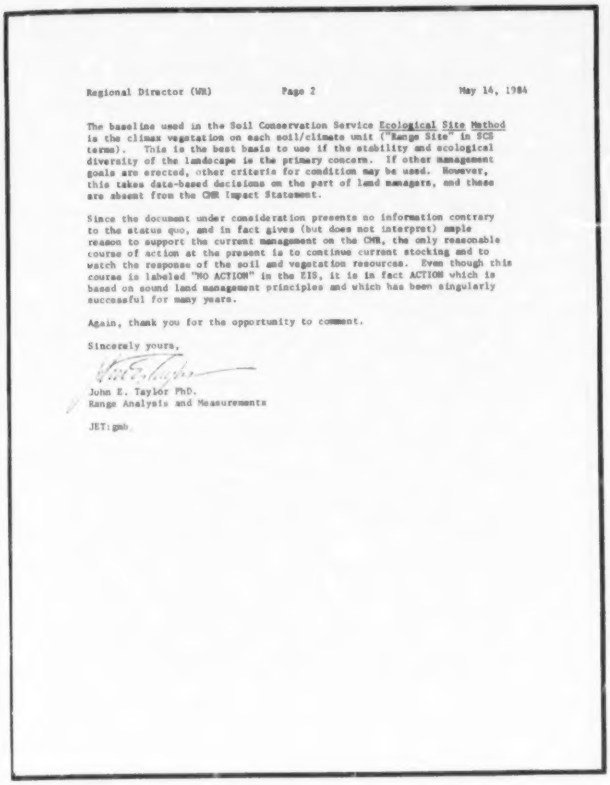
I appreciate the opportunity to comment on the latest iteration of the Draft Environmental Impact Statement for the Charles M. Russell National Wildlife Refuge. In the press of time, I have only a few comments for your consideration. Many more things could be said, but in my view the following are the most important. They are based on detailed personal knowledge of the Refuge and of the ecological principles underlying natural resources management, both going back more than twenty years.

In order for a reasonable and responsible management program to be proposed and implemented on any piece of landscape, the objectives of management must be carefully thought out and then stated in clear, unambiguous terms. The fact that this has not been done in the present instance puts your agency in an awkward position. Not only must you defend a proposed plan of action which is unsupported by a demonstrated need, but if such a plan were implemented, you would not be able to assess its utility in achieving management goals. 1

In this instance, there is no evidence to support a reduction in livestock numbers or to truncate livestock grazing seasons on the DMR. This is not to say that some adjustment in stocking (of livestock or wildlife or both) may not be in the best interest of the basic land resources of the CRM. It is simply that the information provided in the EIS does not point to such a strategy. In fact, the opposite case is more easily made, based on the Range Condition of the Refuge as determined by Soil Conservation Service standards. 2

Your objection to using these standards in a wildlife context (which your staff so frequently and vigorously repeated in their responses to earlier public comments) merely demonstrates an ignorance of the concept of Range Condition as a management tool. There are a great many ways to look at Range Condition, most of which are independent of the specific herbivorous component of the rangeland ecosystem. However, all the ways of assessing Range Condition share one requirement: the articulation of specific management goals or "ideal cases" against which current situations may be measured. These goals may be expressed in terms of any rangeland product or process, but they must be stated in order for a quantitative expression of Range Condition. 3

TELEPHONE (406) 994-3721



Regional Director (WR) Page 2 May 14, 1984

The baseline used in the Soil Conservation Service Ecological Site Method is the climax vegetation on each soil/climate unit ("Range Site" in SCS terms). This is the best basis to use if the stability and ecological diversity of the landscape is the primary concern. If other management goals are erected, other criteria for condition may be used. However, this takes data-based decisions on the part of land managers, and these are absent from the CMR Impact Statement.

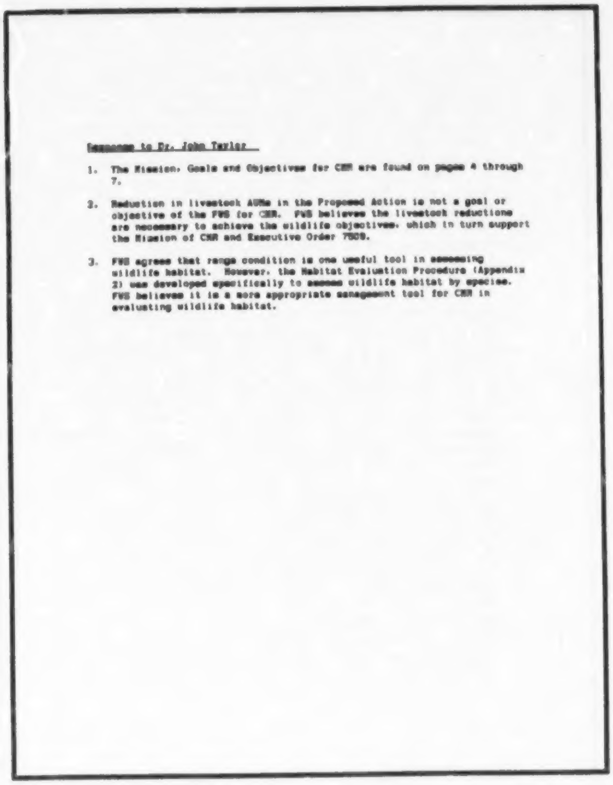
Since the document under consideration presents no information contrary to the status quo, and in fact gives (but does not interpret) ample reason to support the current management on the CMR, the only reasonable course of action at the present is to continue current stocking and to watch the response of the soil and vegetation resources. Even though this course is labeled "NO ACTION" in the EIS, it is in fact ACTION which is based on sound land management principles and which has been singularly successful for many years.

Again, thank you for the opportunity to comment.

Sincerely yours,

John E. Taylor PhD.
Range Analysis and Measurements

JET:gmb

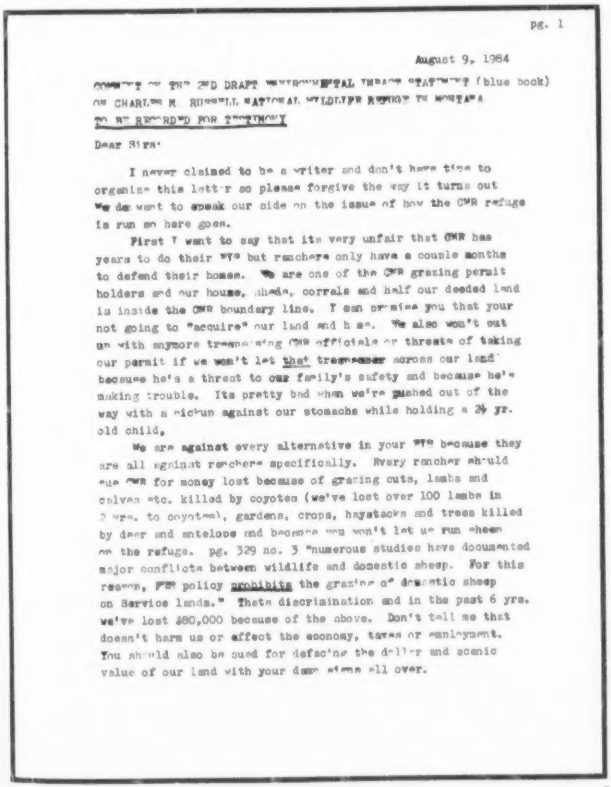


Response to Dr. John Taylor

1. The Mission, Goals and Objectives for CMR are found on pages 4 through 7.

2. Reduction in livestock AUMs in the Proposed Action is not a goal or objective of the FWS for CMR. FWS believes the livestock reductions are necessary to achieve the wildlife objectives, which in turn support the Mission of CMR and Executive Order 7509.

3. FWS agrees that range condition is one useful tool in assessing wildlife habitat. However, the Habitat Evaluation Procedure (Appendix 2) was developed specifically to assess wildlife habitat by species. FWS believes it is a more appropriate management tool for CMR in evaluating wildlife habitat.



pg. 1

August 9, 1984

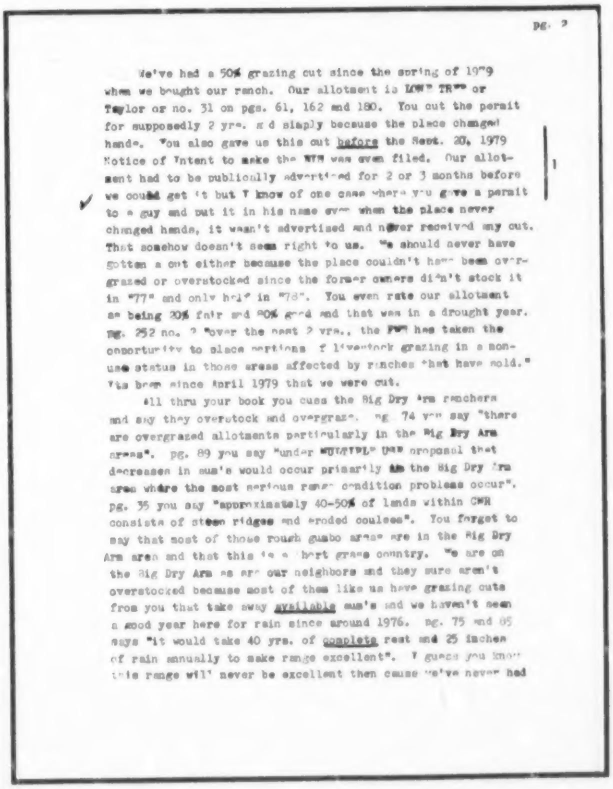
COMMENT ON THE 2ND DRAFT ENVIRONMENTAL IMPACT STATEMENT (blue book) ON CHARLES M. RUSSELL NATIONAL WILDLIFE REFUGE IN MONTANA TO BE RECORDED FOR TESTIMONY

Dear Sirs:

I never claimed to be a writer and don't have time to organize this letter so please forgive the way it turns out we do want to speak our side on the issue of how the CMR refuge is run so here goes.

First I want to say that its very unfair that CMR has years to do their EIS but ranchers only have a couple months to defend their homes. We are one of the CMR grazing permit holders and our house, sheds, corrals and half our deeded land is inside the CMR boundary line. I can promise you that your not going to "acquire" our land and home. We also won't put up with anymore trespassing CMR officials or threats of taking our permit if we won't let that trespasser across our land because he's a threat to our family's safety and because he's making trouble. Its pretty bad when we're pushed out of the way with a pickup against our stomachs while holding a 2½ yr. old child.

We are against every alternative in your EIS because they are all against ranchers specifically. Every rancher should sue CMR for money lost because of grazing cuts, lambs and calves etc. killed by coyotes (we've lost over 100 lambs in 2 yrs. to coyotes), gardens, crops, haystacks and trees killed by deer and antelope and because you won't let us run sheep on the refuge. pg. 329 no. 3 "numerous studies have documented major conflicts between wildlife and domestic sheep. For this reason, FWS policy prohibits the grazing of domestic sheep on Service lands." Thats discrimination and in the past 6 yrs. we've lost $80,000 because of the above. Don't tell me that doesn't harm us or affect the economy, taxes or employment. You should also be sued for defacing the dollar and scenic value of our land with your damn signs all over.



pg. 2

We've had a 50% grazing cut since the spring of 1979 when we bought our ranch. Our allotment is LONE TREE or Taylor or no. 31 on pgs. 61, 162 and 180. You cut the permit for supposedly 2 yrs. and simply because the place changed hands. You also gave us this cut before the Sept. 20, 1979 Notice of Intent to make the EIS was even filed. Our allotment had to be publically advertised for 2 or 3 months before we could get it but I know of one case where you gave a permit to a guy and put it in his name even when the place never changed hands, it wasn't advertised and never received any cut. That somehow doesn't seem right to us. We should never have gotten a cut either because the place couldn't have been overgrazed or overstocked since the former owners didn't stock it in "77" and only half in "78". You even rate our allotment as being 20% fair and 80% good and that was in a drought year. pg. 252 no. 2 "over the past 2 yrs., the FWS has taken the opportunity to place portions of livestock grazing in a non-use status in those areas affected by ranches that have sold." Its been since April 1979 that we were cut. 1

All thru your book you cuss the Big Dry Arm ranchers and say they overstock and overgraze. pg. 74 you say "there are overgrazed allotments particularly in the Big Dry Arm areas". pg. 89 you say "under MULTIPLE USE proposal that decreases in aum's would occur primarily in the Big Dry Arm area where the most serious range condition problems occur". pg. 35 you say "approximately 40-50% of lands within CMR consists of steep ridges and eroded coulees". You forget to say that most of those rough gumbo areas are in the Big Dry Arm area and that this is a short grass country. We are on the Big Dry Arm as are our neighbors and they sure aren't overstocked because most of them like us have grazing cuts from you that take away available aum's and we haven't seen a good year here for rain since around 1976. pg. 75 and 85 says "it would take 40 yrs. of complete rest and 25 inches of rain annually to make range excellent". I guess you know this range will never be excellent then cause we've never had that much rain. Isn't it funny that ranchers are blamed for the gumbo hills here that will never produce a damn thing and you do your surveys on a drought year and in hot July! To prove that the Big Dry Area isn't overgrazed and overstocked, I took these facts from your own book.

From pgs. 61, 162 and 180. Big Dry Area ranchers-us & our neighbors: NAME ALLOTMENT
W. Twitchell Snap Creek no. 30 7,033 acres
0% poor cond. 52% fair 47% good 01% excellent cond.
Taylor (us) Lone Tree no. 31 2,532 acres
0% poor cond. 20% fair 80% good 0% excellent cond.
McKerlick Big Dry no. 29 9,528 acres
0% poor cond. 15% fair 66% good 19% excellent cond.
J. Twitchell Nelson Creek no. 27 13,310 acres
01% poor cond. (prairie dog town) 22% fair 57% good 20% excellent
Collins Bug Creek no. 26 8,731 acres
02% poor cond. (prairie dog towns) 33% fair 61% good 04% ex.
Nelson Rock Creek no. 25 5,811 acres
0% poor cond. 54% fair 47% good 0% excellent cond.
Ferguson Sand Arroyo-Rock Creek no. 24 4,372 acres
0% poor cond. 51% fair 47% good 02% excellent cond.
Roughton (sold to Coldwell in "79") Coyote Basin no. 32 12,493 acres
0% poor cond. 14% fair 86% good 0% excellent cond.
Henning (sold to Grimsrud 1982) Bax Creek no. 33 10,767 acres
0% poor cond. 0% fair 73% good 27% excellent cond.
K. Edwards Norville Creek no. 34 4,059 acres
0% poor cond. 01% fair 44% good 55% excellent cond
L. Edwards Spring Draw no. 35 3,886 acres
0% poor cond. 13% fair 62% good 25% excellent cond.
Paine Pine Coulee no. 28 241 acres
0% poor cond. 0% fair 100% good 0% excellent cond.

This is a total of 82,763 acres (a very big portion of the refuge) that you misrepresent to the public so they'll write and say get those overgrazing-overstocking ranchers off the refuge. The above figures show only 3% of the acres to be in poor cond. and that 3% is prairie dog towns. Below find more

lies you say about us Big Dry ranchers:
pg. 68 under NO ACTION "present forage allocations would provide for undesirable aesthetic qualities in several allotments which have a considerable portion of deteriorated range. Most of these allotments are found in the Big Dry Area which receives a considerable amount of recreational use during the grazing season when poor range conditions are most obvious". You don't say that the poor range and deterioration is the gumbo hills that won't ever produce anything and that the recreation occurs mostly on Nelson Creek. Another lie you use against us is pg. 67 "some range deterioration would continue as a result of overstocking on some allotments, especially in the Big Dry Area portion of the refuge. Continued overgrazing of those allotments in deteriorated condition could compound the situation for the entire allotment, as livestock are forced to range farther from preferred range to find forage". Now, first of all, your calling us and our neighbors overstocking and overgrazing people and thats a damn lie that could get you sued for ruining our reputation and secondly, all thru your book you bellyache cause you say cattle won't go more than 1 mile from water, then in this quote you bellyache cause they will.

pg. xi shows that "only 7% of CMR is in fair condition as a result of livestock grazing", yet you blame livestock and ranchers for everything all thru your book. If you replace cattle with bison, elk and bighorn sheep don't tell me their dung won't be found in camp areas and that they wouldn't damage riparian areas". pg. 43 "poor range conditions are typically associated with prairie dog towns: locations of prairie dog towns have high correlations with past disturbances such as corrals, stockponds, overgrazed areas, or former homesteads and are probably indicators of past use rather than causes of current conditions. (C. Knowles personnel communication). Not one of our dog towns occurs on a place disturbed by any of the above, they were good grassy places not used for corrals, homesteads, stockponds, or overgrazed. pg. 35 you say "5,240 acres of prairie dog towns are on CMR and that

✓ those towns provide all or partial habitat requirements for some 30 other species of wildlife". What habitat requirements do they provide and I can say that they do nothing but overgraze and ruin the land. They do not provide anything but misery. pg. 329 no. 4 "prairie dogs are wildlife and create wildlife habitat. They are a symptom of poor range condition (not synonomous with wildlife habitat conditions) and not generally the cause of it". ✓ What wildlife habitat again, and what kind of double talk is this? pg. 330 no. 5 "Animal Damage Control personnel of the FWS will provide assistance upon request from a private landowner". Anytime we ever mentioned that a prairie dog needed controlled, even on our land, they had a fit. 2

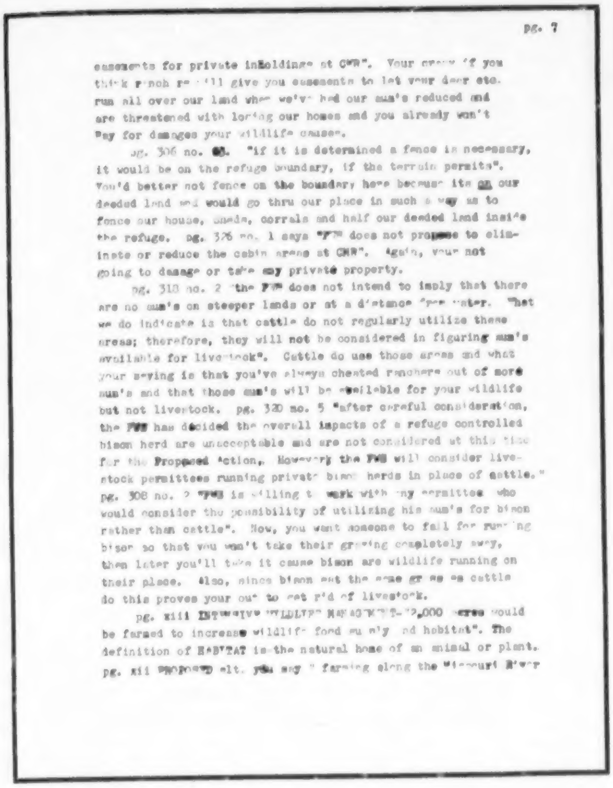
Charles Marion Russell would hang all of you government parasites if he knew how you disgrace him with the dirty deals you pull on ranchers while using his name.

✓✓ pg. 306 no. 22 Who are the six ranchers on rest-rotation and who are the two deferred grazing systems? On pg. 335 no. 1 you say "there are several rest-rotation systems in use on the refuge at the present time. Further use is suggested in the Proposed Action". 3 pg. 333 no. 1 "the CMR staff will work closely with the landowners and other agencies involved in preparation of habitat management plans for each allotment or group of allotments once the final EIS is published and the Record of Decision is issued. At that time, the special concerns for individual allotments, as you have expressed, will be carefully considered". CMR won't work with us when we ask for rest-rotation. We want to use CMR early one spring and BLM early the next so they each have a chance to rest but CMR won't let us use them early. This proves that they lie when they say they'll work with the rancher and that they won't let a rancher manage a place with any common sense.

As I said earlier, we've lost over 100 lambs to coyotes in the last 2 yrs. and we feel that CMR should have to pay for damages their coyotes cause. Don't try saying we don't watch our sheep either because we have alot of witnesses to

testify otherwise. pg. 8 under NO ACTION you say "no aerial hunting for coyotes would be allowed". Well, drag out your checkbook anytime a lamb gets killed then. pg. 67 you admit "coyotes can cause significant economic loss to ranchers". pg. 35 "trapping is currently allowed only as needed to protect resource values. However, a limited trapping program is being considered starting with the 1984-85 trapping season". If we have a killer coyote in our sheep, believe me, your not going to stop us from flying or trapping and we're not paying you to let us trap him. This is a worse country than Russia. pg. 200 no. 3 "preventative preditor control or wholesale control are prohibited on CMR. Control of the offending preditor is, however, permitted on CMR upon documentation by Animal Damage Control personnel". I'll be damned if we're gonna waste time getting something filed with you when we could be on the hot tracks of a killer. Since April there has been 28 coyotes taken off our place and we'd lost 40 lambs already. Theres still no shortage of coyotes on our place and we just got more kills.

pg. vii under PROPOSED Alt. you say "you'd cut aum's 33% and "acquire" some inholdings". Your not going to get our land because we're not going to be willing sellers. pg. 16 PROPOSED—as ranches were sold, grazing privileges could be retired across CMR until approximately 15-20 no grazing areas were established". You lie all thru your book but especially when you say things like the following double talk: pg. 336 no. 3 "the FWS does not propose to condemn private lands". pg. 327 no. 4 "the lack of specific acquisition proposals is acknowledged; that level of detail is inappropriate in an EIS. The policy of the FWS is to acquire only lands that are needed to reach the goals of the refuge. When these parcels are identified for acquisition, a willing seller basis will be used. Although FWS has the authority to acquire lands by condemnation under very special circumstances, this authority is seldom used and is not planned for CMR". pg. 295 "the FWS has no plans to expand the refuge but will consider wildlife



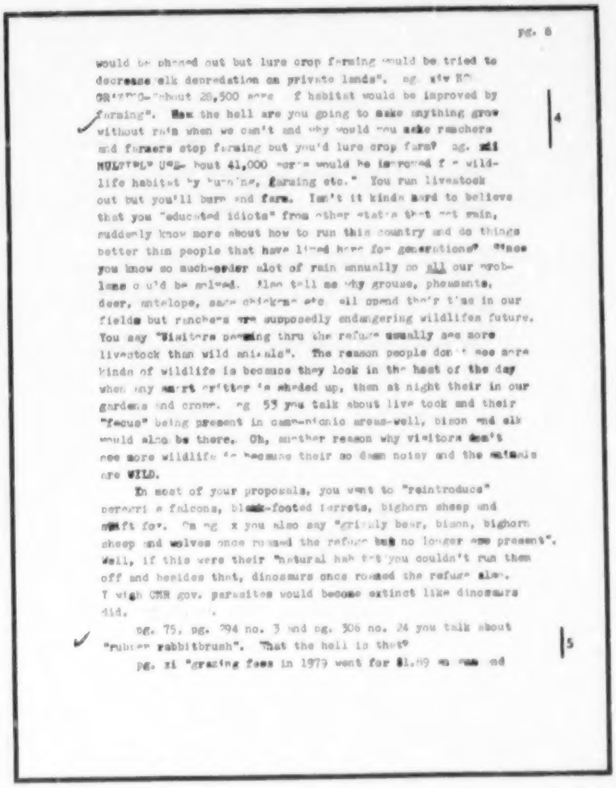
pg. 7

easements for private inholdings at CMR". Your crazy if you think ranchers will give you easements to let your deer etc. run all over our land when we've had our aum's reduced and are threatened with losing our homes and you already won't pay for damages your wildlife causes.

pg. 306 no. 23. "if it is determined a fence is necessary, it would be on the refuge boundary, if the terrain permits". You'd better not fence on the boundary here because its on our deeded land and would go thru our place in such a way as to fence our house, sheds, corrals and half our deeded land inside the refuge. pg. 326 no. 1 says "FWS does not propose to eliminate or reduce the cabin areas at CMR". Again, your not going to damage or take any private property.

pg. 318 no. 2 "the FWS does not intend to imply that there are no aum's on steeper lands or at a distance from water. What we do indicate is that cattle do not regularly utilize these areas; therefore, they will not be considered in figuring aum's available for livestock". Cattle do use those areas and what your saying is that you've always cheated ranchers out of more aum's and that those aum's will be available for your wildlife but not livestock. pg. 320 no. 5 "after careful consideration, the FWS has decided the overall impacts of a refuge controlled bison herd are unacceptable and are not considered at this time for the Proposed Action. However, the FWS will consider livestock permittees running private bison herds in place of cattle." pg. 308 no. 2 "FWS is willing to work with any permittee who would consider the possibility of utilizing his aum's for bison rather than cattle". Now, you want someone to fall for running bison so that you won't take their grazing completely away, then later you'll take it cause bison are wildlife running on their place. Also, since bison eat the same grass as cattle do this proves your out to get rid of livestock.

pg. xiii INTENSIVE WILDLIFE MANAGEMENT-12,000 acres would be farmed to increase wildlife food supply and habitat". The definition of HABITAT is the natural home of an animal or plant. pg. xii PROPOSED alt. you say " farming along the Missouri River



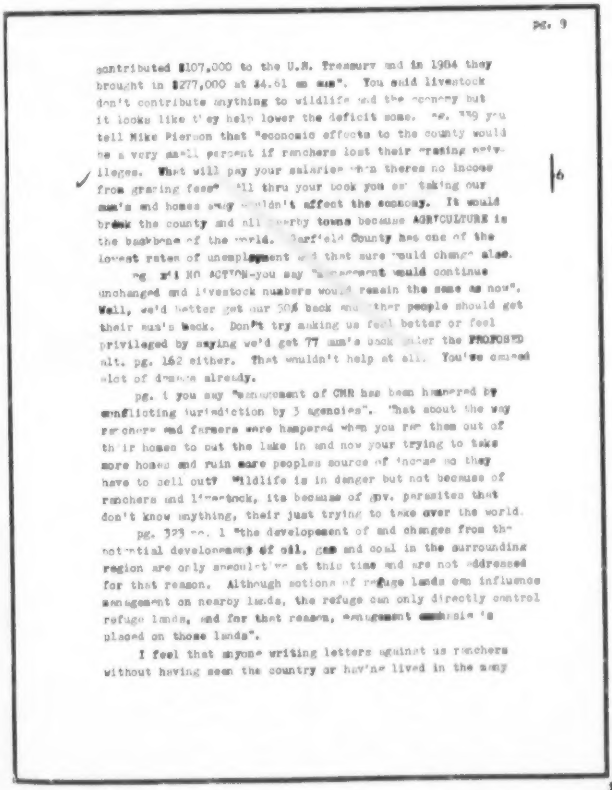
pg. 8

would be phased out but lure crop farming would be tried to decrease elk depredation on private lands". pg. xiv NO GRAZING-"about 28,500 acres of habitat would be improved by farming". How the hell are you going to make anything grow without rain when we can't and why would you make ranchers and farmers stop farming but you'd lure crop farm? pg. xii MULTIPLE USE-about 41,000 acres would be improved for wildlife habitat by burning, farming etc." You run livestock out but you'll burn and farm. Isn't it kinda hard to believe that you "educated idiots" from other states that get rain, suddenly know more about how to run this country and do things better than people that have lived here for generations? Since you know so much-order alot of rain annually so all our problems could be solved. Also tell me why grouse, pheasants, deer, antelope, sage chickens etc. all spend their time in our fields but ranchers are supposedly endangering wildlifes future. You say "Visitors passing thru the refuge usually see more livestock than wild animals". The reason people don't see more kinds of wildlife is because they look in the heat of the day when any smart critter is shaded up, then at night their in our gardens and crops. pg. 53 you talk about livestock and their "feces" being present in camp-picnic areas-well, bison and elk would also be there. Oh, another reason why visitors don't see more wildlife is because their so damn noisy and the animals are WILD. | 4

In most of your proposals, you want to "reintroduce" peregrine falcons, black-footed ferrets, bighorn sheep and swift fox. On pg. x you also say "grizzly bear, bison, bighorn sheep and wolves once roamed the refuge but no longer are present". Well, if this were their "natural habitat" you couldn't run them off and besides that, dinosaurs once roamed the refuge also. I wish CMR gov. parasites would become extinct like dinosaurs did.

pg. 75, pg. 294 no. 3 and pg. 306 no. 24 you talk about "rubber rabbitbrush". What the hell is that? | 5

pg. xi "grazing fees in 1979 went for $1.89 an aum and



pg. 9

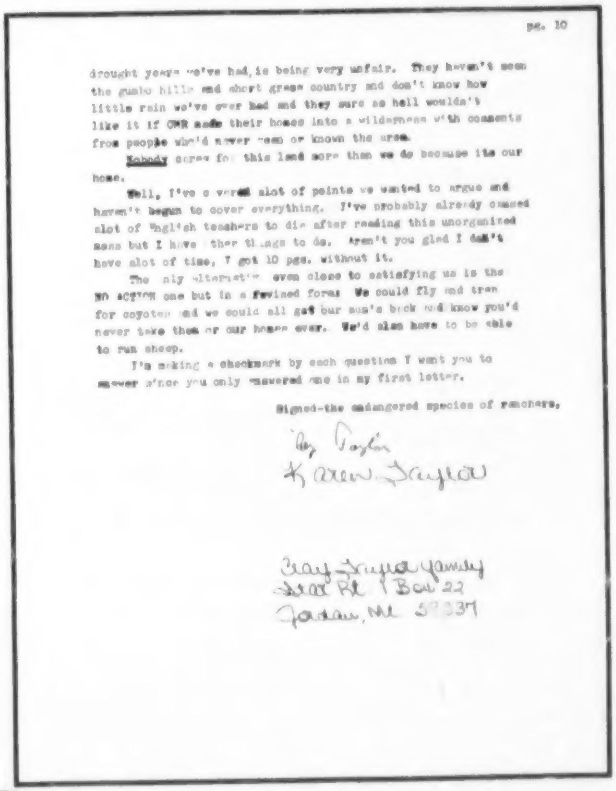
contributed $107,000 to the U.S. Treasury and in 1984 they brought in $277,000 at $4.61 an aum". You said livestock don't contribute anything to wildlife and the economy but it looks like they help lower the deficit some. pg. 339 you tell Mike Pierson that "economic effects to the county would be a very small percent if ranchers lost their grazing privileges. What will pay your salaries when theres no income from grazing fees? All thru your book you say taking our aum's and homes away wouldn't affect the economy. It would break the county and all nearby towns because AGRICULTURE is the backbone of the world. Garfield County has one of the lowest rates of unemployment and that sure would change also. | 6

pg. xii NO ACTION-you say "management would continue unchanged and livestock numbers would remain the same as now". Well, we'd better get our 50% back and other people should get their aum's back. Don't try making us feel better or feel privileged by saying we'd get 77 aum's back under the PROPOSED alt. pg. 162 either. That wouldn't help at all. You've caused alot of damage already.

pg. 1 you say "management of CMR has been hampered by conflicting jurisdiction by 3 agencies". What about the way ranchers and farmers were hampered when you ran them out of their homes to put the lake in and now your trying to take more homes and ruin more peoples source of income so they have to sell out? Wildlife is in danger but not because of ranchers and livestock, its because of gov. parasites that don't know anything, their just trying to take over the world.

pg. 323 no. 1 "the developement of and changes from the potential developement of oil, gas and coal in the surrounding region are only speculative at this time and are not addressed for that reason. Although actions of refuge lands can influence management on nearby lands, the refuge can only directly control refuge lands, and for that reason, management emphasis is placed on those lands".

I feel that anyone writing letters against us ranchers without having seen the country or having lived in the many



pg. 10

drought years we've had, is being very unfair. They haven't seen the gumbo hills and short grass country and don't know how little rain we've ever had and they sure as hell wouldn't like it if CMR made their homes into a wilderness with comments from people who'd never seen or known the area.

Nobody cares for this land more than we do because its our home.

Well, I've covered alot of points we wanted to argue and haven't begun to cover everything. I've probably already caused alot of English teachers to die after reading this unorganized mess but I have other things to do. Aren't you glad I don't have alot of time, I got 10 pgs. without it.

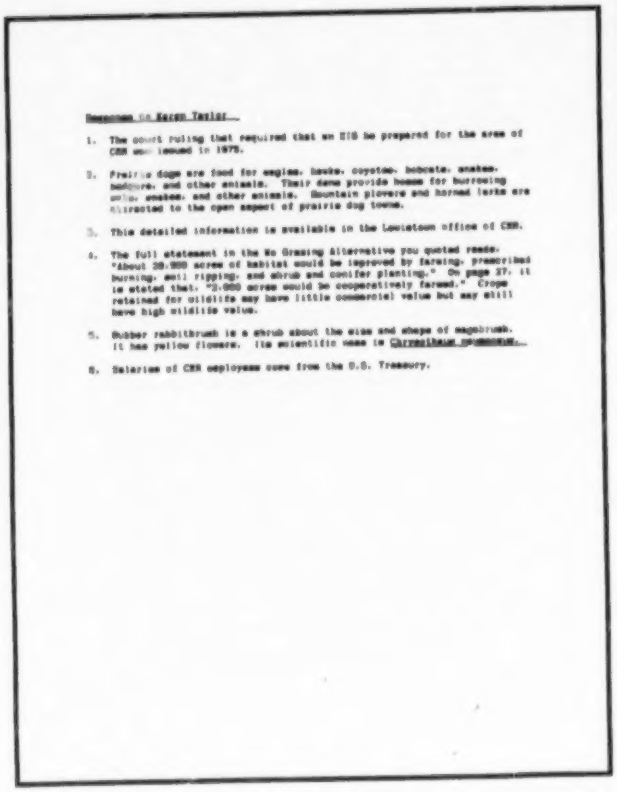
The only alternative even close to satisfying us is the NO ACTION one but in a revised form. We could fly and trap for coyotes and we could all get our aum's back and know you'd never take them or our homes ever. We'd also have to be able to run sheep.

I'm making a checkmark by each question I want you to answer since you only answered one in my first letter.

Signed-the endangered species of ranchers,

Ray Taylor
Karen Taylor

Ray Taylor Family
Star Rt 1 Box 22
Jordan, MT 59337



Response to Karen Taylor

1. The court ruling that required that an EIS be prepared for the area of CMR was issued in 1975.

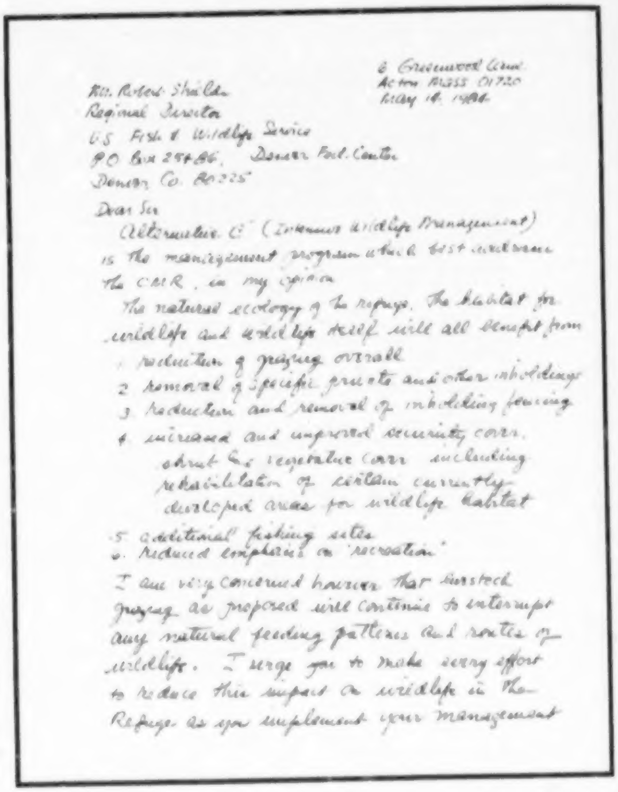
2. Prairie dogs are food for eagles, hawks, coyotes, bobcats, snakes, badgers, and other animals. Their dens provide homes for burrowing owls, snakes, and other animals. Mountain plovers and horned larks are attracted to the open aspect of prairie dog towns.

3. This detailed information is available in the Lewistown office of CMR.

4. The full statement in the No Grazing Alternative you quoted reads, "About 20,000 acres of habitat would be improved by farming, prescribed burning, soil ripping, and shrub and conifer planting." On page 27, it is stated that, "2,000 acres would be cooperatively farmed." Crops retained for wildlife may have little commercial value but may still have high wildlife value.

5. Rubber rabbitbrush is a shrub about the size and shape of sagebrush. It has yellow flowers. Its scientific name is *Chrysothamnus nauseosus*.

6. Salaries of CMR employees come from the U.S. Treasury.



6 Greenwood Lane
Acton MASS 01720
May 14, 1985

Mr. Robert Shields
Regional Director
U.S. Fish & Wildlife Service
P.O. Box 25486, Denver Fed. Center
Denver Co. 80225

Dear Sir

Alternative C (Intensive Wildlife Management) is the management program which best enhances the CMR, in my opinion.

The natural ecology of the refuge, the habitat for wildlife and wildlife itself will all benefit from

1. reduction of grazing overall
2. removal of specific private and other inholdings
3. reduction and removal of inhibiting fencing
4. increased and improved security cover, shrub & vegetative cover including rehabilitation of certain currently developed areas for wildlife habitat
5. additional fishing sites
6. reduced emphasis on "recreation"

I am very concerned however that livestock grazing as proposed will continue to interrupt any natural feeding patterns and routes of wildlife. I urge you to make every effort to reduce this impact on wildlife in the Refuge as you implement your management

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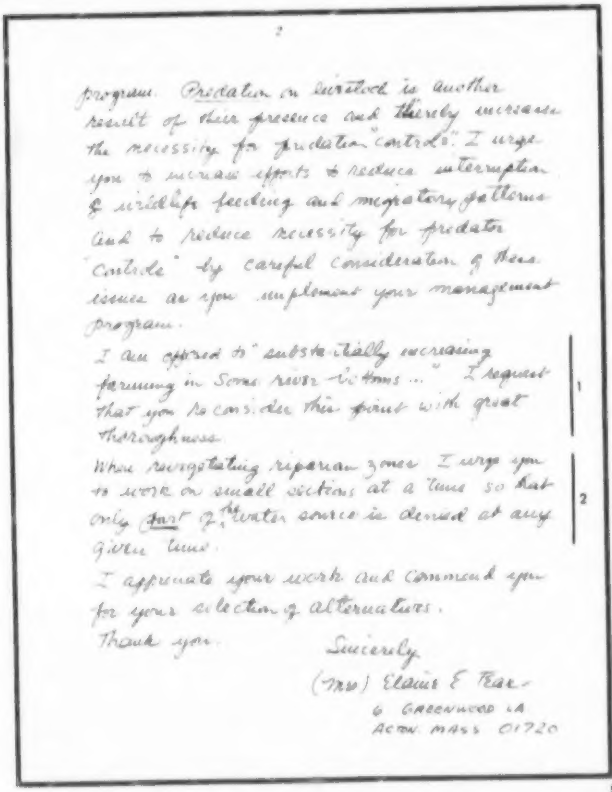

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program. Predation on livestock is another result of their presence and thereby increases the necessity for predation "controls". I urge you to increase efforts to reduce interruption of wildlife feeding and migratory patterns and to reduce necessity for predator "controls" by careful consideration of these issues as you implement your management program.

I am opposed to "substantially increasing farming in some river bottoms ..." I request that you reconsider this point with great thoroughness. 1

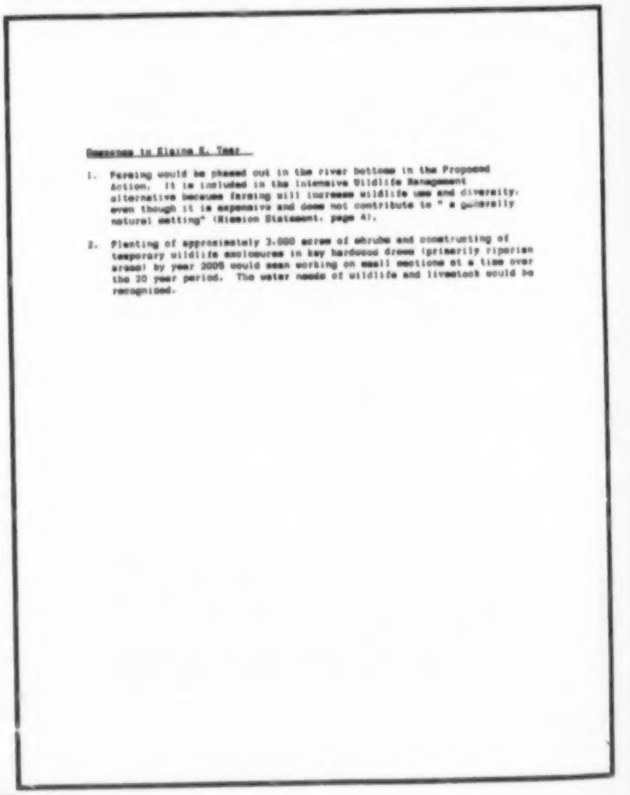
When revegetating riparian zones I urge you to work on small sections at a time so that only part of the water source is denied at any given time. 2

I appreciate your work and commend you for your selection of alternatives.

Thank you.

Sincerely,

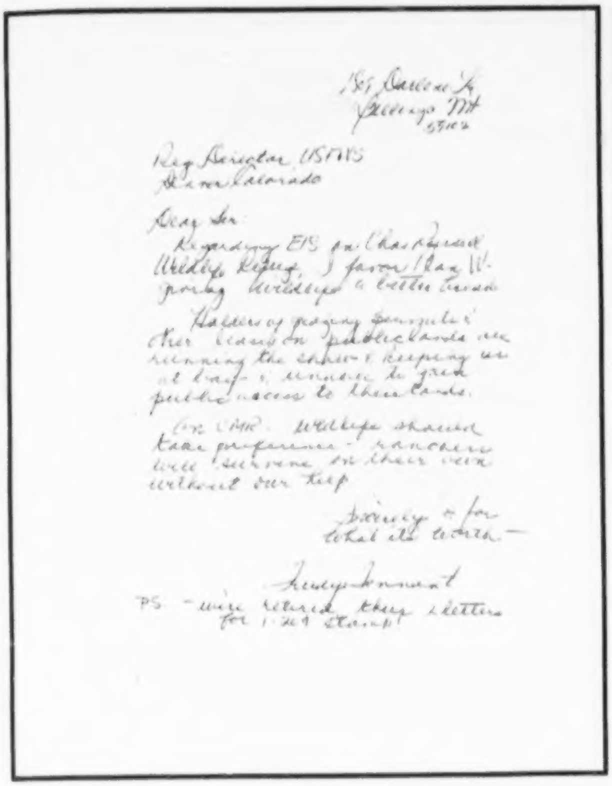
(Mrs) Elaine E Tear
6 GREENWOOD LA
ACTON MASS 01720



Response to Elaine E. Tear

1. Farming would be phased out in the river bottoms in the Proposed Action. It is included in the Intensive Wildlife Management alternative because farming will increase wildlife use and diversity, even though it is expensive and does not contribute to " a generally natural setting" (Mission Statement, page 4).

2. Planting of approximately 3,000 acres of shrubs and constructing of temporary wildlife exclosures in key hardwood draws (primarily riparian areas) by year 2005 would mean working on small sections at a time over the 20 year period. The water needs of wildlife and livestock would be recognized.



1505 Darlene Ln
Billings Mt
59102

Reg Director USFWS
Denver Colorado

Dear Sir:

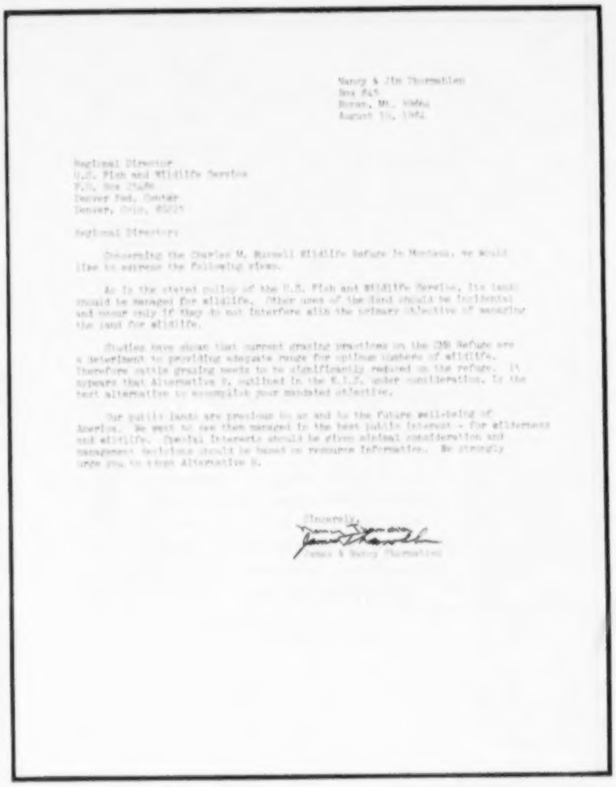
Regarding EIS on Chas Russell Wildlife Refuge, I favor Plan B - giving wildlife a better break.

Holders of grazing permits & other leases on public lands are running the show & keeping us at bay & unable to gain public access to these lands.

On CMR wildlife should take preference - ranchers will survive on their own without our help

Sincerely & for what its worth -

PS - were returned these letters for 1-20¢ stamp!



Nancy & Jim Thormahlen
Box 845
[illegible], Mt. [illegible]
August 10, 1984

Regional Director
U.S. Fish and Wildlife Service
P.O. Box 25486
Denver Fed. Center
Denver, Colo. 80225

Regional Director:

Concerning the Charles M. Russell Wildlife Refuge in Montana, we would like to express the following views.

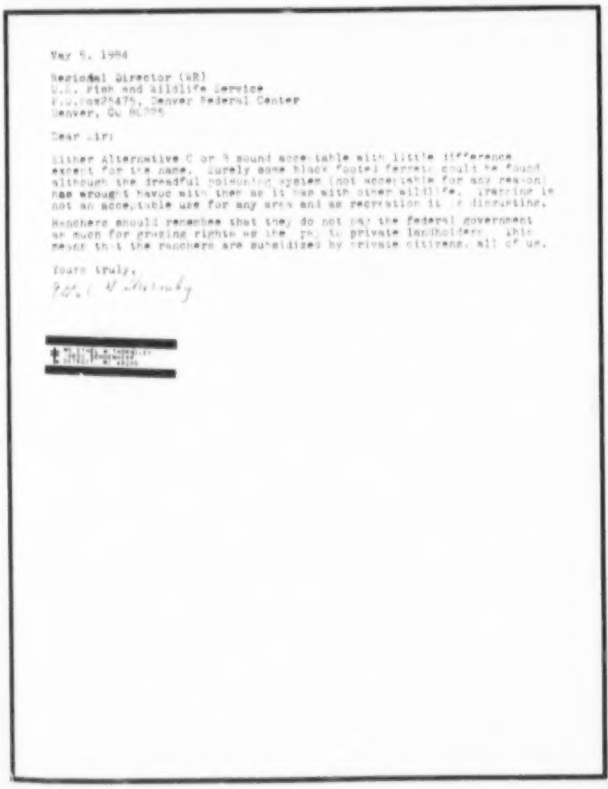
As is the stated policy of the U.S. Fish and Wildlife Service, its lands should be managed for wildlife. Other uses of the land should be incidental and occur only if they do not interfere with the primary objective of managing the land for wildlife.

Studies have shown that current grazing practices on the CMR Refuge are a detriment to providing adequate range for optimum numbers of wildlife. Therefore cattle grazing needs to be significantly reduced on the refuge. It appears that Alternative B, outlined in the E.I.S. under consideration, is the best alternative to accomplish your mandated objective.

Our public lands are precious to us and to the future well-being of America. We want to see them managed in the best public interest - for wilderness and wildlife. Special interests should be given minimal consideration and management decisions should be based on resource information. We strongly urge you to adopt Alternative B.

Sincerely,

James & Nancy Thormahlen



May 5, 1984

Regional Director (WR)
U.S. Fish and Wildlife Service
P.O.Box25486, Denver Federal Center
Denver, Co 80225

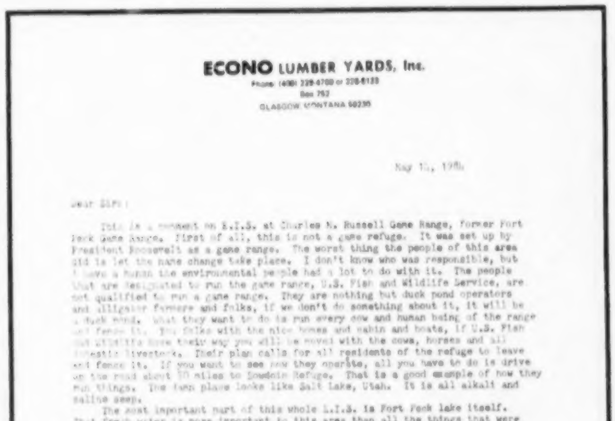
Dear Sir:

Either Alternative C or B sound acceptable with little difference except for the name. Surely some black footed ferrets could be found although the dreadful poisoning system (not acceptable for any reason) has wrought havoc with them as it has with other wildlife. Trapping is not an acceptable use for any area and as recreation it is disgusting.

Ranchers should remember that they do not pay the federal government as much for grazing rights as they pay to private landholders. This means that the ranchers are subsidized by private citizens, all of us.

Yours truly,

[redacted]



ECONO LUMBER YARDS, Inc.
Phone: (406) 228-4700 or 228-8123
Box 752
GLASGOW, MONTANA 59230

May 15, 1984

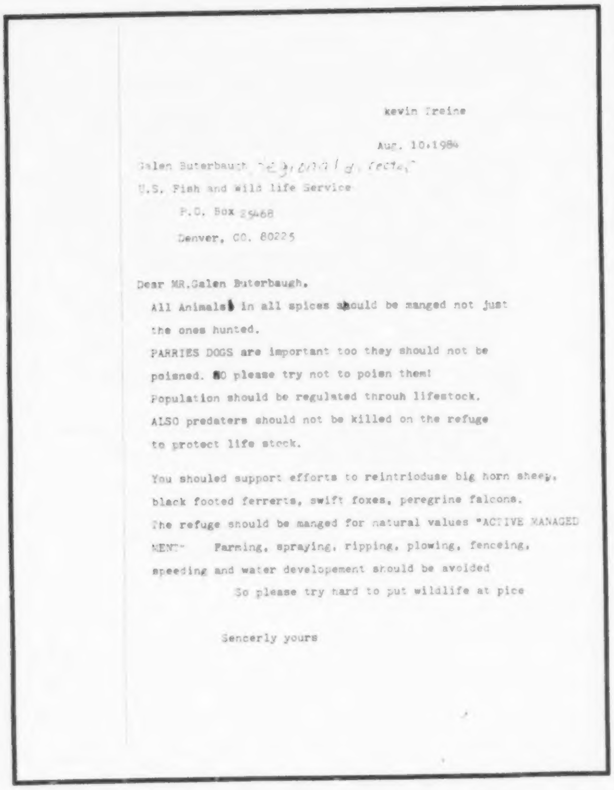
Dear Sirs:

This is a comment on E.I.S. at Charles M. Russell Game Range, former Fort Peck Game Range. First of all, this is not a game refuge. It was set up by President Roosevelt as a game range. The worst thing the people of this area did is let the name change take place. I don't know who was responsible, but I have a hunch the environmental people had a lot to do with it. The people that are designated to run the game range, U.S. Fish and Wildlife Service, are not qualified to run a game range. They are nothing but duck pond operators and alligator farmers and folks, if we don't do something about it, it will be a duck pond. What they want to do is run every cow and human being of the range and fence it. You folks with the nice homes and cabin and boats, if U.S. Fish and Wildlife have their way you will be moved with the cows, horses and all domestic livestock. Their plan calls for all residents of the refuge to leave and fence it. If you want to see how they operate, all you have to do is drive up the road about 30 miles to Bowdoin Refuge. That is a good example of how they run things. The damn place looks like Salt Lake, Utah. It is all alkali and saline seep.

The most important part of this whole E.I.S. is Fort Peck lake itself. That fresh water is more important to this area than all the things that were mentioned before in this letter. Do we want to turn over the only large body of water in Eastern Montana to a foreign government, that is what I call the U.S. Fish and Wildlife Service. If you think we have any control on what they do, you are mistaken. They are controlled by small segments of society called Extreme Environmentalists. Those people could care less about us people in eastern Montana. All you folks that have anything to do with that lake out there, and that's everybody, you should write comments on this E.I.S.

My recommendation on this E.I.S. is to get control of C.M.R. back to the Bureau of Land Management. They have the experience in land management. Also, there should be an additional 6 month period set aside for public meetings.

Paul B. Tihista
Paul B. Tihista



kevin Ireine

Aug. 10,1984

Galen Buterbaugh Regional director
U.S. Fish and wild life Service
P.O. Box 25468
Denver, CO. 80225

Dear MR.Galen Buterbaugh,

All Animals in all spices should be manged not just the ones hunted.

PARRIES DOGS are important too they should not be poisned. SO please try not to poisn them!

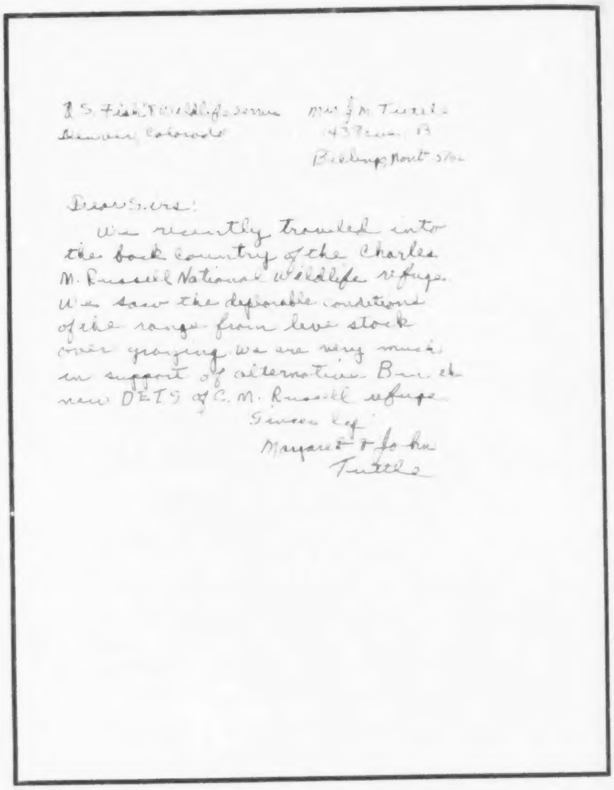
Population should be regulated throuh lifestock.

ALSO predaters should not be killed on the refuge to protect life stock.

You shouled support efforts to reintriodusе big horn sheep, black footed ferrerts, swift foxes, peregrine falcons. The refuge should be manged for natural values "ACTIVE MANAGED MENT" Farming, spraying, ripping, plowing, fenceing, speeding and water developement should be avoided

So please try hard to put wildlife at pice

Sencerly yours



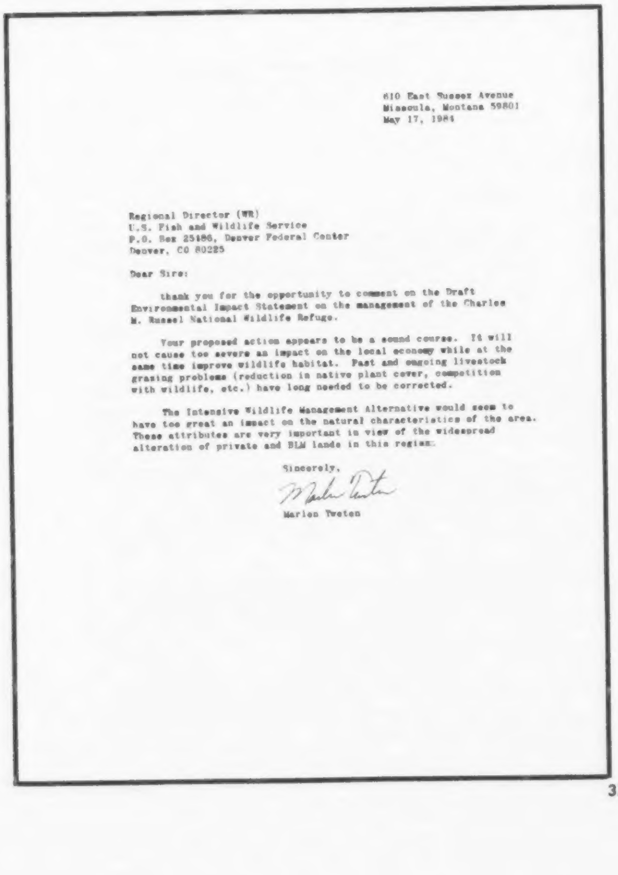
U.S. Fish & Wildlife Service
Denver, Colorado

Mr & Mrs J. M. Tuttle
43 Peace [illegible]
Billings, Mont 5910[illegible]

Dear Sirs:

We recently traveled into the back country of the Charles M. Russell National Wildlife refuge. We saw the deplorable conditions of the range from live stock over grazing. We are very much in support of alternative B in the new DEIS of C. M. Russell refuge.

Sincerely,
Margaret & John Tuttle



610 East Sussex Avenue
Missoula, Montana 59801
May 17, 1984

Regional Director (WR)
U.S. Fish and Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, CO 80225

Dear Sirs:

thank you for the opportunity to comment on the Draft Environmental Impact Statement on the management of the Charles M. Russel National Wildlife Refuge.

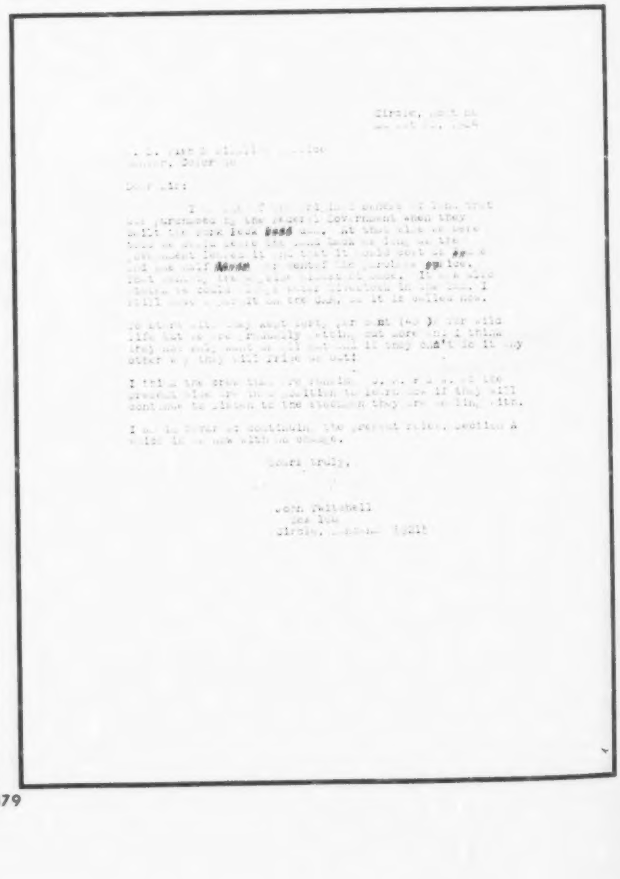
Your proposed action appears to be a sound course. It will not cause too severe an impact on the local economy while at the same time improve wildlife habitat. Past and ongoing livestock grazing problems (reduction in native plant cover, competition with wildlife, etc.) have long needed to be corrected.

The Intensive Wildlife Management Alternative would seem to have too great an impact on the natural characteristics of the area. These attributes are very important in view of the widespread alteration of private and BLM lands in this region.

Sincerely,

Marlen Tweten

Marlen Tweten



Circle, Montana
August [illegible], 1984

U. S. Fish & Wildlife Service
Denver, Colorado

Dear Sir:

I [illegible] acres of land that was purchased by the Federal Government when they built the Fort Peck dam. At that time we were told we could lease the land back as long as the government leased it and that it would cost us [illegible] and one half [illegible] of the purchase price. [illegible] It was also [illegible] I still have a permit on the C.M.R., as it is called now.

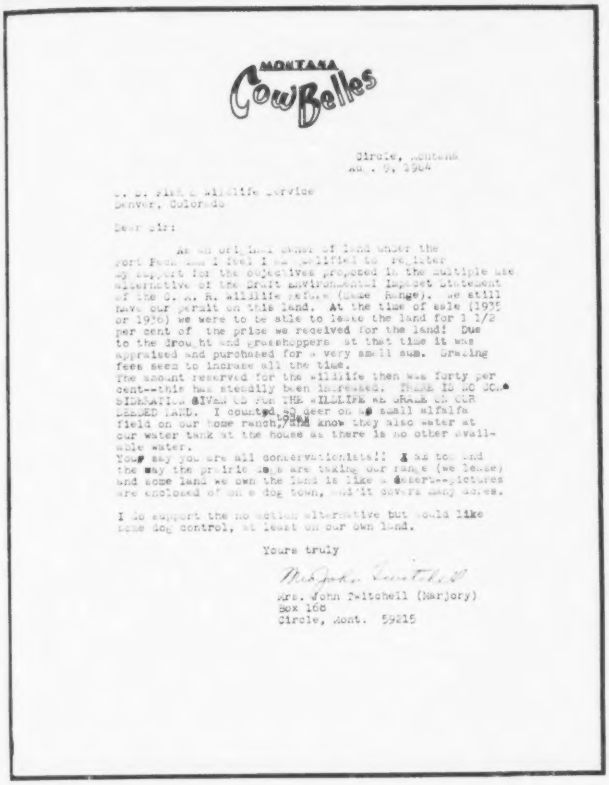
To start with they want [illegible] per cent (40 %) for wild life but we are gradually getting cut more and I think they [illegible] want us all out and if they can't do it any other way they will price us out.

I think the area that are [illegible] of the present plan are in a position to learn now if they will continue to listen to the stockmen they are dealing with.

I am in favor of continuing the present policy, section A which is as now with no change.

Yours truly,

John Twitchell
Box 104
Circle, Montana 59215


MONTANA CowBelles

Circle, Montana
Aug. 9, 1984

U. S. Fish & Wildlife Service
Denver, Colorado

Dear Sir:

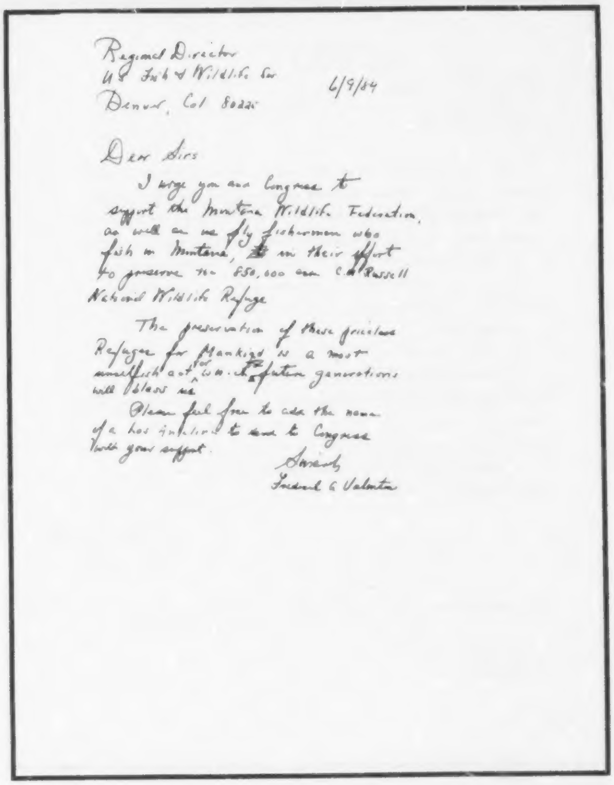
As an original owner of land under the Fort Peck Dam I feel I am qualified to register my support for the objectives proposed in the multiple use alternative of the Draft Environmental Impact Statement of the C. M. R. Wildlife Refuge (Game Range). We still have our permit on this land. At the time of sale (1935 or 1936) we were to be able to lease the land for 1 1/2 per cent of the price we received for the land! Due to the drought and grasshoppers at that time it was appraised and purchased for a very small sum. Grazing fees seem to incrase all the time.
The amount reserved for the wildlife then was forty per cent--this has steadily been increased. THERE IS NO CONSIDERATION GIVEN US FOR THE WILDLIFE WE GRAZE ON OUR DEEDED LAND. I counted 40 deer on a small alfalfa field on our home ranch, today and know they also water at our water tank at the house as there is no other available water.
You say you are all conservationists!! I am too and the way the prairie dogs are taking our range (we lease) and some land we own the land is like a desert--pictures are enclosed of one dog town, and it covers many acres.

I do support the no action alternative but would like some dog control, at least on our own land.

Yours truly

Mrs. John Twitchell

Mrs. John Twitchell (Marjory)
Box 168
Circle, Mont. 59215


Regional Director
US Fish & Wildlife Ser
Denver, Col 80225

6/9/84

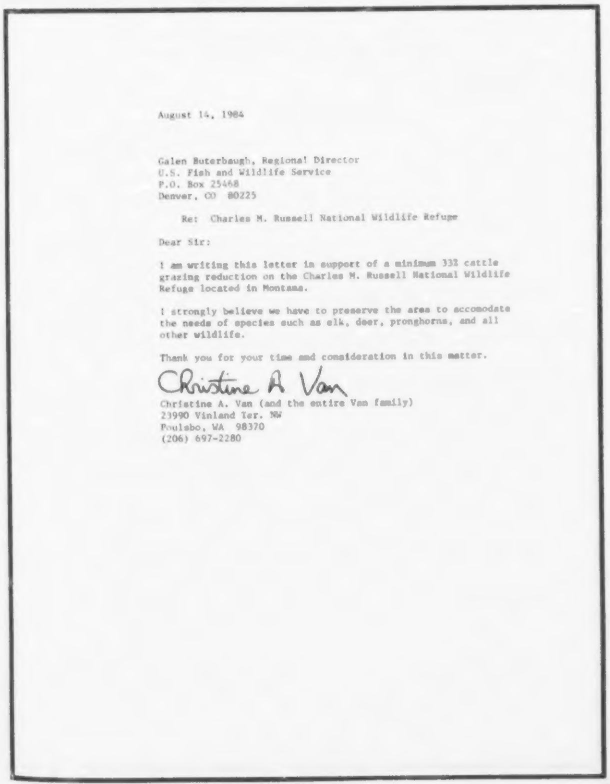
Dear Sirs

I urge you and Congress to support the Montana Wildlife Federation, as well as we fly fishermen who fish in Montana, ~~[illegible]~~ in their effort to preserve the 850,000 acre C.M. Russell National Wildlife Refuge

The preservation of these priceless Refuges for Mankind is a most unselfish act for which the future generations will bless us.

Please feel free to add the name of a [illegible] to send to Congress with your support.

Sincerely
Frederick G Valenta


August 14, 1984

Galen Buterbaugh, Regional Director
U.S. Fish and Wildlife Service
P.O. Box 25468
Denver, CO 80225

Re: Charles M. Russell National Wildlife Refuge

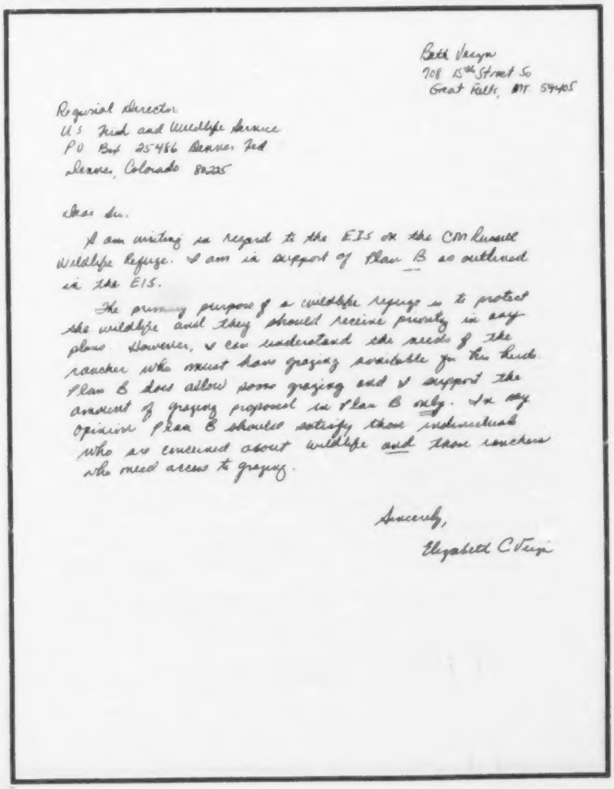
Dear Sir:

I am writing this letter in support of a minimum 33% cattle grazing reduction on the Charles M. Russell National Wildlife Refuge located in Montana.

I strongly believe we have to preserve the area to accomodate the needs of species such as elk, deer, pronghorns, and all other wildlife.

Thank you for your time and consideration in this matter.

Christine A Van
Christine A. Van (and the entire Van family)
23990 Vinland Ter. NW
Poulsbo, WA 98370
(206) 697-2280


Beth Vergo
708 15th Street So
Great Falls, MT 59405

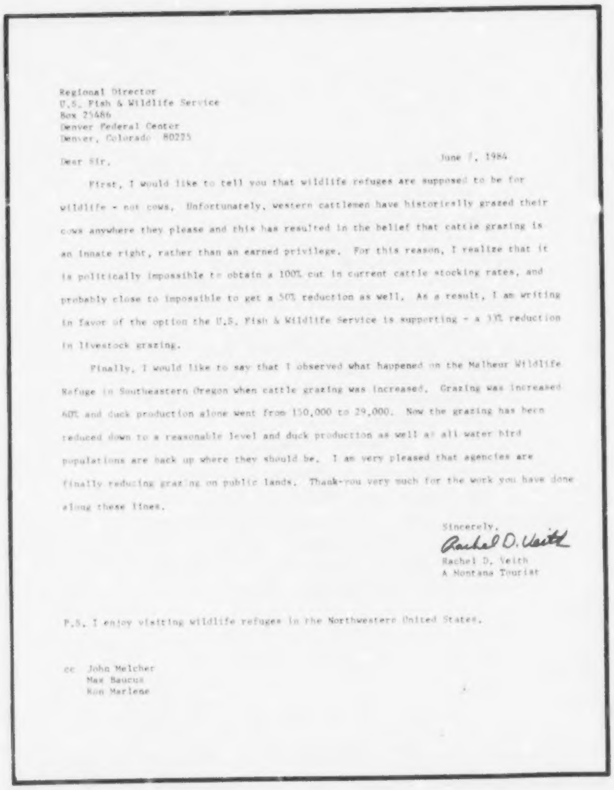
Regional Director
US Fish and Wildlife Service
PO Box 25486 Denver Fed
Denver, Colorado 80225

Dear Sir.

I am writing in regard to the EIS on the CM Russell Wildlife Refuge. I am in support of Plan B as outlined in the EIS.

The primary purpose of a wildlife refuge is to protect the wildlife and they should receive priority in any plans. However, I can understand the needs of the rancher who must have grazing available for his herds. Plan B does allow some grazing and I support the amount of grazing proposed in Plan B only. In my opinion Plan B should satisfy those individuals who are concerned about wildlife and those ranchers who need access to grazing.

Sincerely,
Elizabeth C Vergo



Regional Director
U.S. Fish & Wildlife Service
Box 25486
Denver Federal Center
Denver, Colorado 80225

June 7, 1984

Dear Sir,

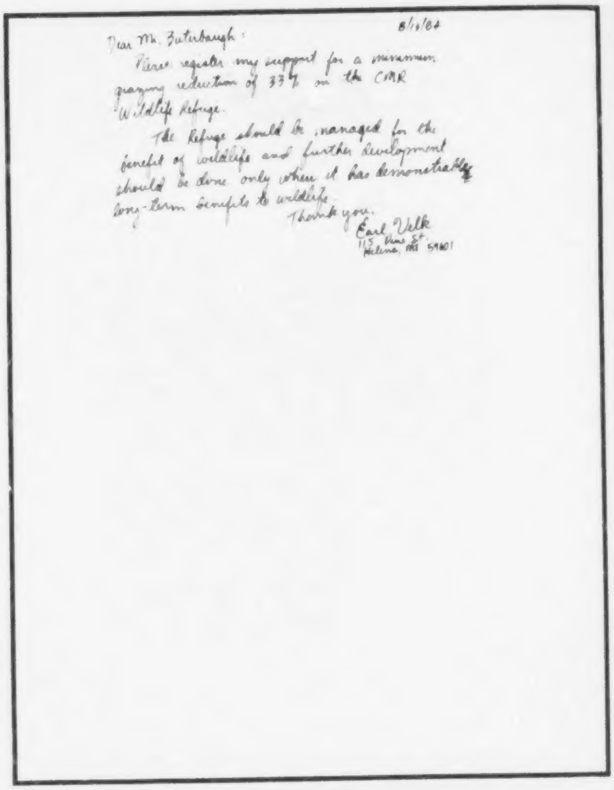
First, I would like to tell you that wildlife refuges are supposed to be for wildlife - not cows. Unfortunately, western cattlemen have historically grazed their cows anywhere they please and this has resulted in the belief that cattle grazing is an innate right, rather than an earned privilege. For this reason, I realize that it is politically impossible to obtain a 100% cut in current cattle stocking rates, and probably close to impossible to get a 50% reduction as well. As a result, I am writing in favor of the option the U.S. Fish & Wildlife Service is supporting - a 33% reduction in livestock grazing.

Finally, I would like to say that I observed what happened on the Malheur Wildlife Refuge in Southeastern Oregon when cattle grazing was increased. Grazing was increased 60% and duck production alone went from 150,000 to 29,000. Now the grazing has been reduced down to a reasonable level and duck production as well as all water bird populations are back up where they should be. I am very pleased that agencies are finally reducing grazing on public lands. Thank-you very much for the work you have done along these lines.

Sincerely,
Rachel D. Veith
Rachel D. Veith
A Montana Tourist

P.S. I enjoy visiting wildlife refuges in the Northwestern United States.

cc John Melcher
Max Baucus
Ron Marlene



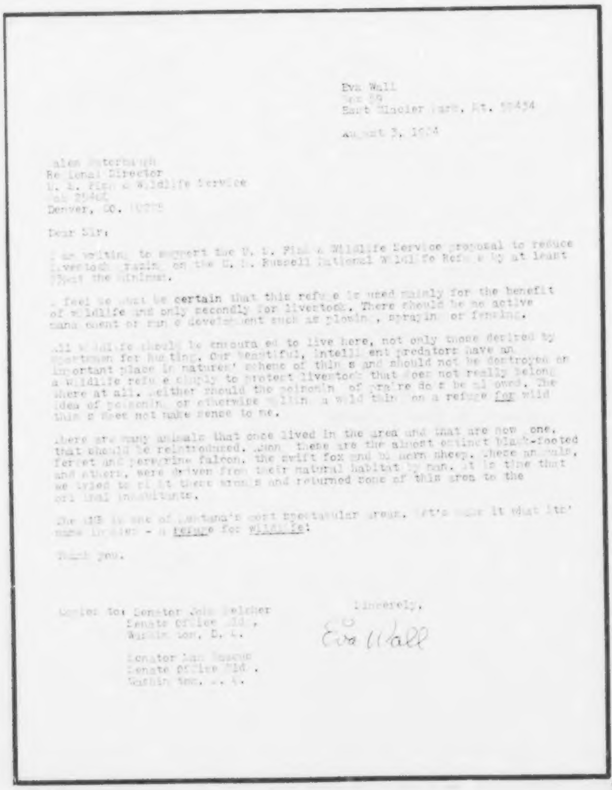
8/1/84

Dear Mr. Buterbaugh:

Please register my support for a minimum grazing reduction of 33% on the CMR Wildlife Refuge.

The Refuge should be managed for the benefit of wildlife and further development should be done only when it has demonstrable long-term benefits to wildlife.

Thank you.
Earl Velk
115 Vine St.
Helena, MT 59601



Eva Wall
Box 59
East Glacier Park, Mt. 59434

August 3, 1984

Galen Buterbaugh
Regional Director
U. S. Fish & Wildlife Service
Box 25486
Denver, CO. 80225

Dear Sir:

I am writing to support the U. S. Fish & Wildlife Service proposal to reduce livestock grazing on the C. M. Russell National Wildlife Refuge by at least 33% at the minimum.

I feel we must be certain that this refuge is used mainly for the benefit of wildlife and only secondly for livestock. There should be no active management or range development such as plowing, spraying or fencing.

All wildlife should be encouraged to live here, not only those desired by sportsmen for hunting. Our beautiful, intelligent predators have an important place in natures' scheme of things and should not be destroyed on a wildlife refuge simply to protect livestock that does not really belong there at all. Neither should the poisoning of prairie dogs be allowed. The idea of poisoning or otherwise killing a wild thing on a refuge for wild things does not make sense to me.

There are many animals that once lived in the area and that are now gone, that should be reintroduced. Among these are the almost extinct black-footed ferret and peregrine falcon, the swift fox and big horn sheep. These animals, and others, were driven from their natural habitat by man. It is time that we tried to right these wrongs and returned some of this area to the original inhabitants.

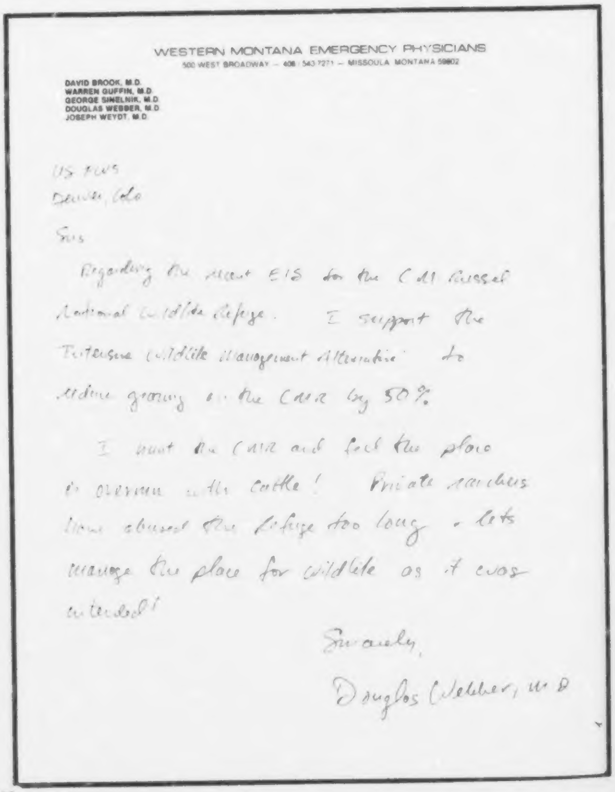
The CMR is one of Montana's most spectacular areas. Let's make it what its' name implies - a refuge for wildlife!

Thank you.

Sincerely,
Eva Wall

Copies to: Senator John Melcher
Senate Office Bldg.
Washington, D. C.

Senator Max Baucus
Senate Office Bld.
Washington, D. C.



WESTERN MONTANA EMERGENCY PHYSICIANS
500 WEST BROADWAY — 406/543-7271 — MISSOULA, MONTANA 59802

DAVID BROOK, M.D.
WARREN GUFFIN, M.D.
GEORGE SINELNIK, M.D.
DOUGLAS WEBBER, M.D.
JOSEPH WEYDT, M.D.

US FWS
Denver, Colo

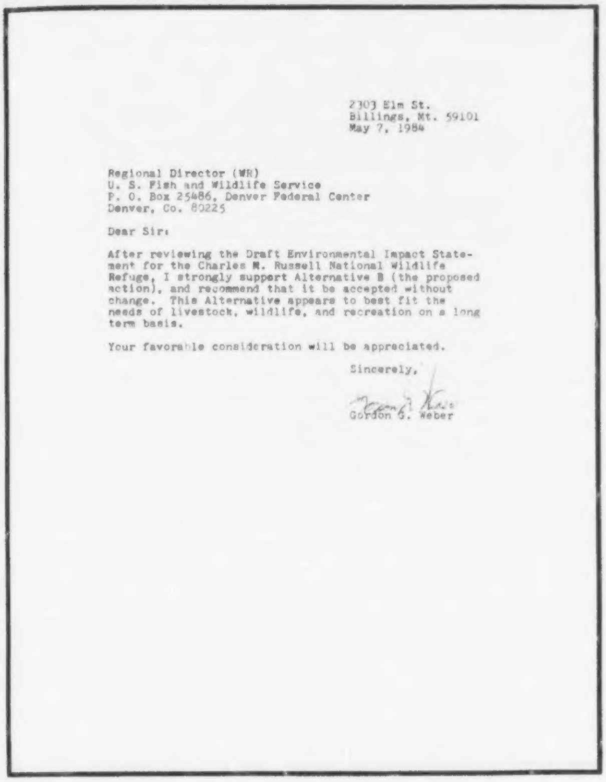
Sirs

Regarding the recent EIS for the C M Russell National Wildlife Refuge. I support the "Intensive Wildlife Management Alternative" to reduce grazing on the CMR by 50%.

I hunt the CMR and feel the place is overrun with cattle! Private ranchers have abused the Refuge too long - lets manage the place for wildlife as it was intended!

Sincerely,

Douglas Webber, M.D.



2303 Elm St.
Billings, Mt. 59101
May 7, 1984

Regional Director (WR)
U. S. Fish and Wildlife Service
P. O. Box 25486, Denver Federal Center
Denver, Co. 80225

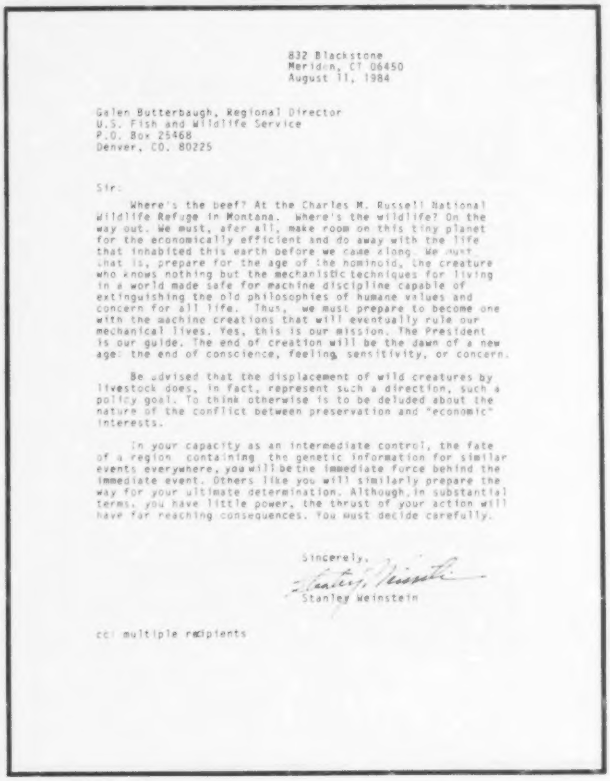
Dear Sir:

After reviewing the Draft Environmental Impact Statement for the Charles M. Russell National Wildlife Refuge, I strongly support Alternative B (the proposed action), and recommend that it be accepted without change. This Alternative appears to best fit the needs of livestock, wildlife, and recreation on a long term basis.

Your favorable consideration will be appreciated.

Sincerely,

Gordon G. Weber



832 Blackstone
Meriden, CT 06450
August 11, 1984

Galen Butterbaugh, Regional Director
U.S. Fish and Wildlife Service
P.O. Box 25468
Denver, CO. 80225

Sir:

Where's the beef? At the Charles M. Russell National Wildlife Refuge in Montana. Where's the wildlife? On the way out. We must, afer all, make room on this tiny planet for the economically efficient and do away with the life that inhabited this earth before we came along. We must, that is, prepare for the age of the hominoid, the creature who knows nothing but the mechanistic techniques for living in a world made safe for machine discipline capable of extinguishing the old philosophies of humane values and concern for all life. Thus, we must prepare to become one with the machine creations that will eventually rule our mechanical lives. Yes, this is our mission. The President is our guide. The end of creation will be the dawn of a new age: the end of conscience, feeling, sensitivity, or concern.

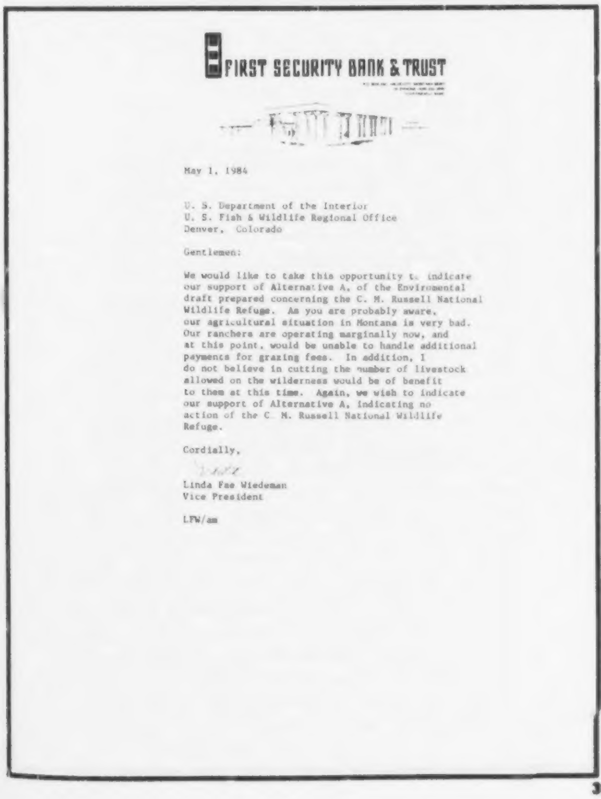
Be advised that the displacement of wild creatures by livestock does, in fact, represent such a direction, such a policy goal. To think otherwise is to be deluded about the nature of the conflict between preservation and "economic" interests.

In your capacity as an intermediate control, the fate of a region containing the genetic information for similar events everywhere, you will be the immediate force behind the immediate event. Others like you will similarly prepare the way for your ultimate determination. Although, in substantial terms, you have little power, the thrust of your action will have far reaching consequences. You must decide carefully.

Sincerely,

Stanley Weinstein

cc: multiple recipients



FIRST SECURITY BANK & TRUST

May 1, 1984

U. S. Department of the Interior
U. S. Fish & Wildlife Regional Office
Denver, Colorado

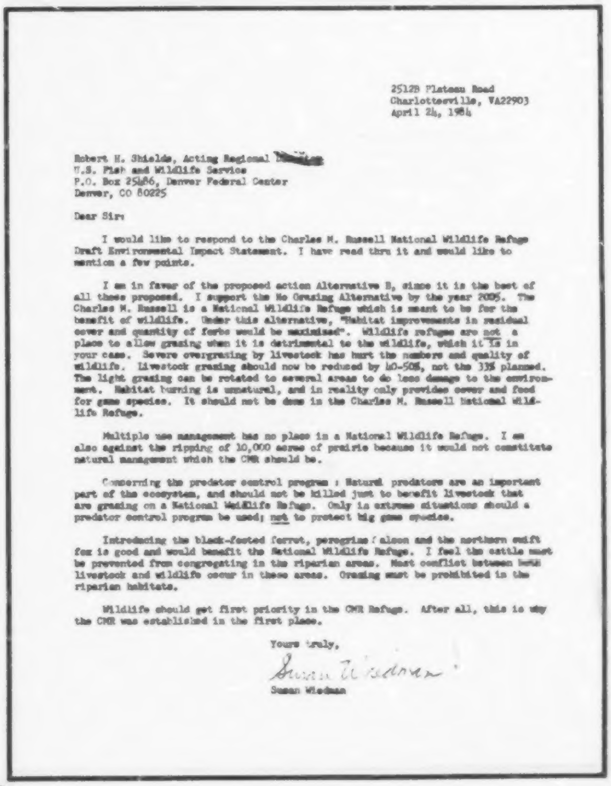
Gentlemen:

We would like to take this opportunity to indicate our support of Alternative A, of the Enviromental draft prepared concerning the C. M. Russell National Wildlife Refuge. As you are probably aware, our agricultural situation in Montana is very bad. Our ranchers are operating marginally now, and at this point, would be unable to handle additional payments for grazing fees. In addition, I do not believe in cutting the number of livestock allowed on the wilderness would be of benefit to them at this time. Again, we wish to indicate our support of Alternative A, indicating no action of the C. M. Russell National Wildlife Refuge.

Cordially,

Linda Fae Wiedeman
Vice President

LFW/am



2512B Plateau Road
Charlottesville, VA22903
April 24, 1984

Robert H. Shields, Acting Regional [illegible]
U.S. Fish and Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, CO 80225

Dear Sir:

I would like to respond to the Charles M. Russell National Wildlife Refuge Draft Environmental Impact Statement. I have read thru it and would like to mention a few points.

I am in favor of the proposed action Alternative B, since it is the best of all those proposed. I support the No Grazing Alternative by the year 2005. The Charles M. Russell is a National Wildlife Refuge which is meant to be for the benefit of wildlife. Under this alternative, "Habitat improvements in residual cover and quantity of forbs would be maximized". Wildlife refuges are not a place to allow grazing when it is detrimental to the wildlife, which it is in your case. Severe overgrazing by livestock has hurt the numbers and quality of wildlife. Livestock grazing should now be reduced by 40-50%, not the 33% planned. The light grazing can be rotated to several areas to do less damage to the environment. Habitat burning is unnatural, and in reality only provides cover and food for game species. It should not be done in the Charles M. Russell National Wildlife Refuge.

Multiple use management has no place in a National Wildlife Refuge. I am also against the ripping of 10,000 acres of prairie because it would not constitute natural management which the CMR should be.

Concerning the predator control program : Natural predators are an important part of the ecosystem, and should not be killed just to benefit livestock that are grazing on a National Wildlife Refuge. Only in extreme situations should a predator control program be used; not to protect big game species.

Introducing the black-footed ferret, peregrine falcon and the northern swift fox is good and would benefit the National Wildlife Refuge. I feel the cattle must be prevented from congregating in the riparian areas. Most conflict between both livestock and wildlife occur in these areas. Grazing must be prohibited in the riparian habitats.

Wildlife should get first priority in the CMR Refuge. After all, this is why the CMR was established in the first place.

Yours truly,

Susan Wiedman

Susan Wiedman

2609 9th Avenue South
Great Falls, MT 59405
12 May 84

Mr. Robert H. Shields
Acting Regional Director
U.S. Fish and Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, CO 80225

Dear Mr. Shields,

Thank you for the opportunity to comment on the DEIS for the C.M. Russell National Wildlife Refuge. I would like to register my support for the Proposed Action (Alternative B) though, as observed frequently in the first round of comments in 1980, the other alternatives really are not viable.

Positive aspects of Alternative B include:

a. Stocking rates reduced by 1/3, with later turn-in, earlier turn-out to improve wildlife habitat;
b. Reintroduction of black-footed ferrets, peregrine falcons, swift fox and bighorn sheep. (Would/does the presence of peregrines/bald eagles, as endangered species, provide any meaningful impetus for an officially-directed shift away from the use of lead shot on this national wildlife refuge?)
c. Periodic review of road access and closures. Since roads are a major disturbance factor for wildlife, on such a refuge as CMR they should be kept to the absolute minimal level that still allows necessary administrative and recreational access;
d. A fire management plan that permits prescribed burns as well as some natural fires;
e. Provision for visitor contact stations and canoe and sail/powerboat tours;
f. No new cabin sites (though a gradual phase-out of existing sites would be highly preferable) and no new developed recreational sites (other than Fourchette Bay);
g. Phase out of cooperative farming;
h. Selected land purchases on a willing seller basis.

Predator and prairie dog control policy is still unclear. The FWS response to the Defenders of Wildlife statement, December 1, 1980, states: "Predator control has been fully addressed in the FEIS-Mammalian Predator Damage Management for Livestock Production in the Western U.S., and also in the FEIS-Operation of the National Wildlife Refuge System." However, since the above-mentioned documents are not readily available to the general reader of your DEIS, it would be desirable to give at least a brief summary of your proposed policy, controversial though it will be. I would support prairie dog control only for human health or safety (?) or as a last resort, along refuge boundaries where the animals are causing actual problems to the adjacent landowner. 1

Coyote control should only be used under extreme conditons to protect endangered species and never on a wildlife refuge to benefit livestock. Hopefully, the FWS proposal to phase out sheep grazing on the CMR entirely will alleviate any demand for coyote control from livestock operators. As observed at one point in your DEIS, "coyotes are wildlife"--on a wildlife refuge they should not be managed for the benefit of livestock.

In conclusion, I would like to commend the FWS for the efforts of the CMR staff in preparing the new DEIS after three years' enforced delay, answering questions and requests and encouraging public participation in this planning process. I will be interested to see how the FWS in its FEIS addresses the above issues and establishes priorities for its Proposed Action.

Sincerely yours,

Rebecca R. Williams

Rebecca R. Williams

cc: Senator John Melcher
Senator Max Baucus
Congressman Ron Marlenee

Response to Rebecca Williams

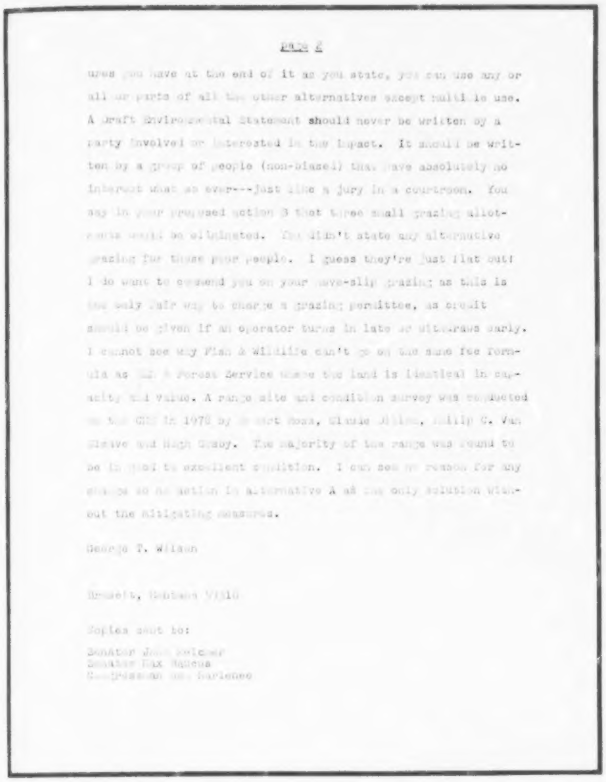
1. **Current Fish & Wildlife Service policy for predator and prairie dog control for CMR is given on pages 8 and 9. It is modified slightly for the Proposed Action on page 14.**

Brusett, Montana
May 24, 1984

Regional Director (WR)
U.S. Fish & Wildlife Service
Denver Federal Center
Mr. Robert H. Shields

Dear Mr. Shields;

I am writing a letter of comment on your second Environmental Impact Statement on the Charles M. Russell National Wildlife Refuge in Montana. I recommend alternative A---no action---as it is the only feasible action that you can use and get along with everyone. I'm a rancher with a permit on the C.M.R. Any reduction in grazing will greatly affect the economy of Eastern Montana. Your second DEIS is even a bigger bunch of lies than the first one, if possible. You started with the cover which shows Charlie Russell with a herd of elk. I'm surprised you don't cause him to turn over in his grave! Charlie Russell was a cowboy and an artist. He worked cows all his active life. The least you could have done, would have been to have the decency to put a cow on the cover with him. You fail to state in this book of lies how much money the Gov't. has spent trying to eradicate the prairie dog, coyote and wolf. If you can't contain these kind of animals under fence in your game refuge, I'm sure you'll see terrorist groups formed in this area. You prepared this DEIS solely for the benefit of wildlife and it's employees. If you wanted to be fair you could have had alternative F, which would turn this game range back to the BLM and let some-one manage it that has brain one. You state that it would take Congressional action to implement alternative D, which is multiple use. I'm sure Congressional action could turn this back to the BLM also. Your no action alternative A, leaves you with a loop-hole as big as the rest of your lies. With the mitigating meas- 1



page 2

uses you have at the end of it as you state, you can use any or all or parts of all the other alternatives except multiple use. A Draft Environmental Statement should never be written by a party involved or interested in the impact. It should be written by a group of people (non-biased) that have absolutely no interest what so ever---just like a jury in a courtroom. You say in your proposed action B that three small grazing allotments would be eliminated. You didn't state any alternative grazing for these poor people. I guess they're just flat out! I do want to commend you on your wave-slip grazing as this is the only fair way to charge a grazing permittee, as credit should be given if an operator turns in late or withdraws early. I cannot see why Fish & Wildlife can't go on the same fee formula as BLM & Forest Service where the land is identical in capacity and value. A range site and condition survey was conducted on the CMR in 1978 by Robert Ross, Claude Dillon, Philip C. Van Sleave and Hugh Crosby. The majority of the range was found to be in good to excellent condition. I can see no reason for any change so no action in alternative A as the only solution without the mitigating measures.

George T. Wilson

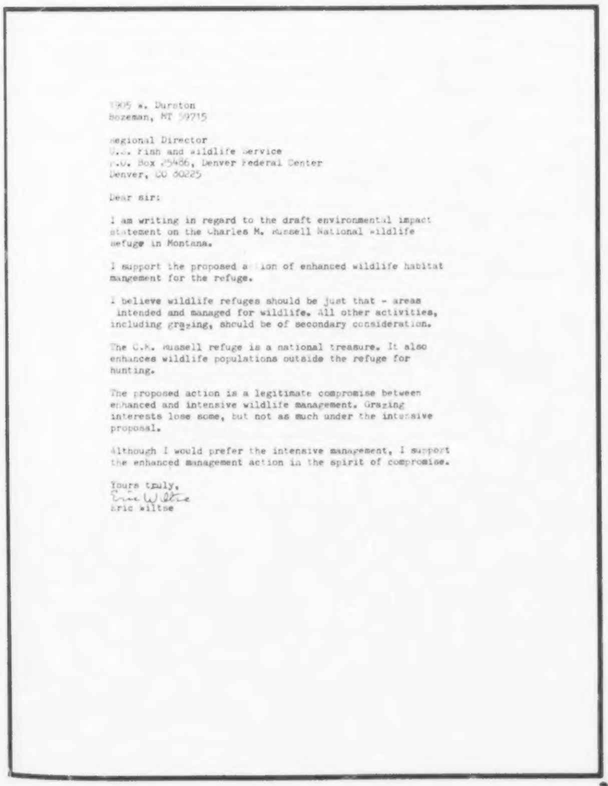
Brusett, Montana 59318

Copies sent to:

Senator John Melcher
Senator Max Baucus
Congressman Ron Marlenee

Response to George T. Wilson

1. The National Environmental Policy Act (NEPA) requires that the Federal agency proposing a major Federal action significantly affecting the quality of the human environment prepare an environmental impact statement (EIS) (P.L. 91-190, Sec. 102(c)).



1905 W. Durston
Bozeman, MT 59715

Regional Director
U.S. Fish and Wildlife Service
P.O. Box 25486, Denver Federal Center
Denver, CO 80225

Dear sir:

I am writing in regard to the draft environmental impact statement on the Charles M. Russell National Wildlife Refuge in Montana.

I support the proposed action of enhanced wildlife habitat mangement for the refuge.

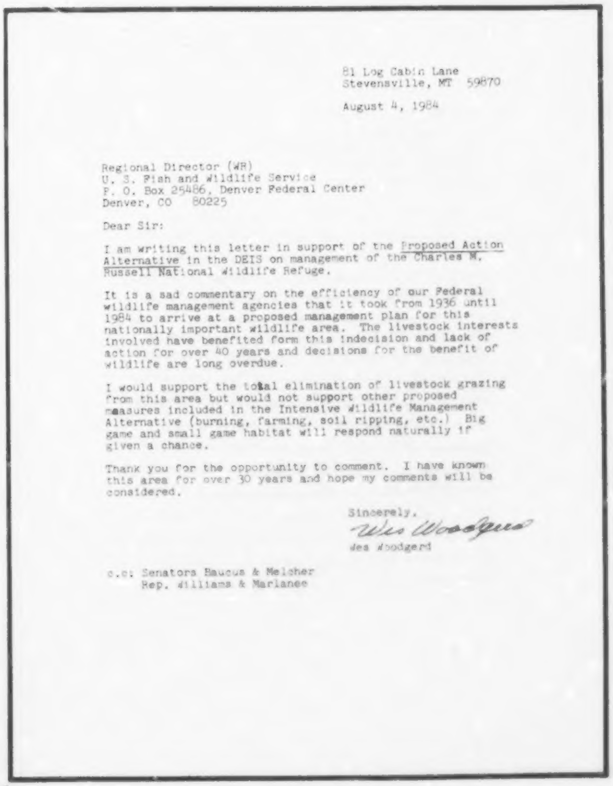
I believe wildlife refuges should be just that - areas intended and managed for wildlife. All other activities, including grazing, should be of secondary consideration.

The C.M. Russell refuge is a national treasure. It also enhances wildlife populations outside the refuge for hunting.

The proposed action is a legitimate compromise between enhanced and intensive wildlife management. Grazing interests lose some, but not as much under the intensive proposal.

Although I would prefer the intensive management, I support the enhanced management action in the spirit of compromise.

Yours truly,
Eric Wiltse
Eric Wiltse



81 Log Cabin Lane
Stevensville, MT 59870

August 4, 1984

Regional Director (WR)
U. S. Fish and Wildlife Service
P. O. Box 25486, Denver Federal Center
Denver, CO 80225

Dear Sir:

I am writing this letter in support of the Proposed Action Alternative in the DEIS on management of the Charles M. Russell National Wildlife Refuge.

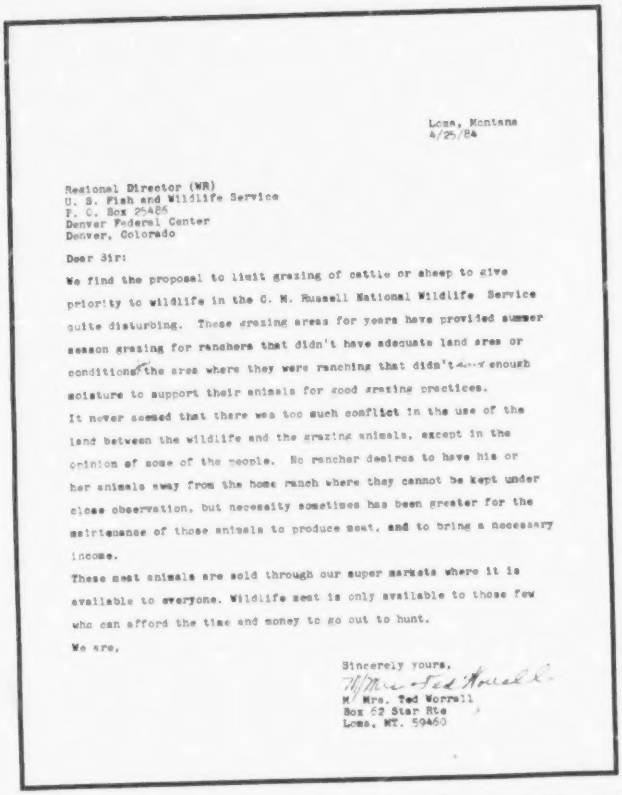
It is a sad commentary on the efficiency of our Federal wildlife management agencies that it took from 1936 until 1984 to arrive at a proposed management plan for this nationally important wildlife area. The livestock interests involved have benefited form this indecision and lack of action for over 40 years and decisions for the benefit of wildlife are long overdue.

I would support the total elimination of livestock grazing from this area but would not support other proposed measures included in the Intensive Wildlife Management Alternative (burning, farming, soil ripping, etc.) Big game and small game habitat will respond naturally if given a chance.

Thank you for the opportunity to comment. I have known this area for over 30 years and hope my comments will be considered.

Sincerely,
Wes Woodgerd
Wes Woodgerd

c.c: Senators Baucus & Melcher
Rep. Williams & Marlanee



Loma, Montana
4/25/84

Regional Director (WR)
U. S. Fish and Wildlife Service
P. O. Box 25486
Denver Federal Center
Denver, Colorado

Dear Sir:

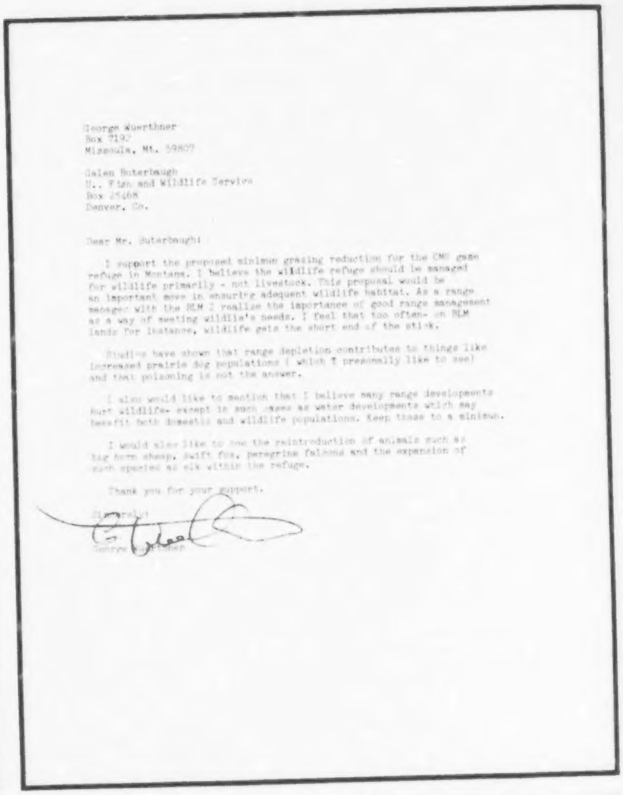
We find the proposal to limit grazing of cattle or sheep to give priority to wildlife in the C. M. Russell National Wildlife Service quite disturbing. These grazing areas for years have provided summer season grazing for ranchers that didn't have adequate land area or conditions/the area where they were ranching that didn't have enough moisture to support their animals for good grazing practices.

It never seemed that there was too much conflict in the use of the land between the wildlife and the grazing animals, except in the opinion of some of the people. No rancher desires to have his or her animals away from the home ranch where they cannot be kept under close observation, but necessity sometimes has been greater for the maintenance of those animals to produce meat, and to bring a necessary income.

These meat animals are sold through our super markets where it is available to everyone. Wildlife meat is only available to those few who can afford the time and money to go out to hunt.

We are,

Sincerely yours,
M/Mrs Ted Worrall
M/ Mrs. Ted Worrall
Box 62 Star Rte
Loma, MT. 59460



George Wuerthner
Box 7192
Missoula, Mt. 59807

Galen Buterbaugh
U.. Fish and Wildlife Service
Box 25468
Denver, Co.

Dear Mr. Buterbaugh:

I support the proposed minimum grazing reduction for the CMR game refuge in Montana. I believe the wildlife refuge should be managed for wildlife primarily - not livestock. This proposal would be an important move in ensuring adequent wildlife habitat. As a range manager with the BLM I realize the importance of good range management as a way of meeting wildlie's needs. I feel that too often- on BLM lands for Ikstance, wildlife gets the short end of the stick.

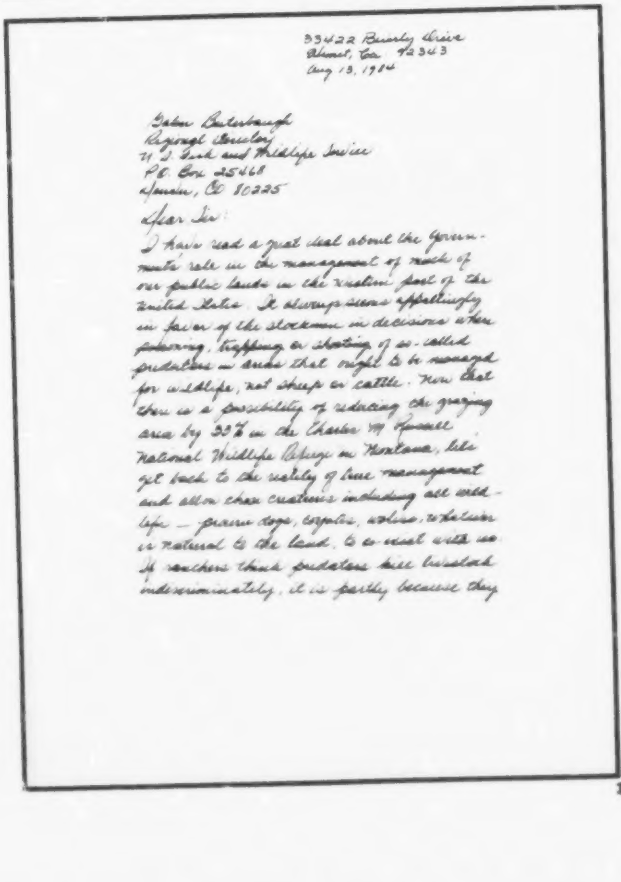
Studies have shown that range depletion contributes to things like increased prairie dog populations (which I presonally like to see) and that poisoning is not the answer.

I also would like to mention that I believe many range developments hurt wildlife- except in such cases as water developments which may benefit both domestic and wildlife populations. Keep those to a minimum.

I would also like to see the reintroduction of animals such as big horn sheep, swift fox, peregrine falcons and the expansion of such species as elk within the refuge.

Thank you for your support.

Sincerely,
George Wuerthner

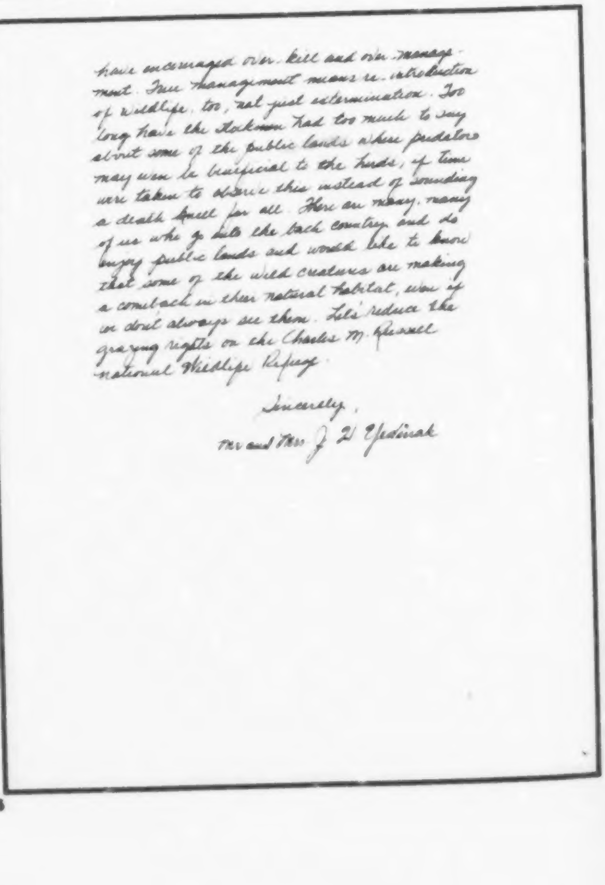


33422 Beverly Drive
Hemet, Ca 92343
Aug 13, 1984

Galen Buterbaugh
Regional Director
U.S. Fish and Wildlife Service
P.O. Box 25468
Denver, CO 80225

Dear Sir:

I have read a great deal about the Government's role in the management of much of our public lands in the western part of the United States. It always seems appallingly in favor of the stockmen in decisions where poisoning, trapping or shooting of so-called predators in areas that ought to be managed for wildlife, not sheep or cattle. Now that there is a possibility of reducing the grazing area by 33% in the Charles M Russell National Wildlife Refuge in Montana, let's get back to the reality of true management and allow those creatures including all wildlife — prairie dogs, coyotes, wolves, whatever is natural to the land, to co-exist with us. If ranchers think predators kill livestock indiscriminately, it is partly because they



have encouraged over-kill and over-management. True management means re-introduction of wildlife, too, not just extermination. Too long have the stockmen had too much to say about some of the public lands where predators may even be beneficial to the herds, if time were taken to observe this instead of sounding a death knell for all. There are many, many of us who go into the back country and do enjoy public lands and would like to know that some of the wild creatures are making a comeback in their natural habitat, even if we don't always see them. Let's reduce the grazing rights on the Charles M. Russell National Wildlife Refuge.

Sincerely,
Mr and Mrs J. W. Yedinak

Aug 14, 1984

Dear Mr. Butterbaugh,

We support the proposed 33% minimum grazing reduction on the CMR Wildlife Refuge. This action, which would improve wildlife habitat, is certainly appropriate in this area.

We also want to express our support for [illegible] for the job he has been doing as refuge manager.

Sincerely,

Dear Mr. Butterbaugh,

I have recently canoed the Missouri River through the CMR Wildlife Refuge. During my trip I was amazed at the terrible amount of damage that is being done to the river and to river banks by cattle. ~~[illegible]~~ No doubt this damage is being transferred to wildlife habitat throughout the CMR area. For that reason, I urge a reduction in grazing area for cattle. Please act immediately to preserve the refuge as habitat for all wildlife — not just the needs of cattle ranchers.

Thank you!

707 E. 16th Avenue
Eugene, Oregon 97401

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5 JUN 84

Dear Director

Total Wildlife is directly related to Total Habitat!

I believe that the wildlife will continue to disappear without some living space. The proof is in our history books. I remember only a few that have gone or are going — Pigeons, Grizzlies, Falcons, Ferrets & on & on ...!

Because of our (Whole U.S.A.!) Greedy SHORT memories, I am forced to write thoughts that we & our elected & appointed LEADERS can't recall &/or Safe guard. So please keep as much Refuge, Wilderness or Primitive area as possible for as long as possible!

yours for a natural Future

1928 [illegible] Ave RT 5
Blgs, MT 59101

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34 N. Crestwood Dr.
Billings, Mt. 59102

May 6, 1984

Mr. Galen Butterbaugh
Regional Director
U.S. Fish & Wildlife Service
Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Mr. Butterbaugh:

I am writing about the new Draft Environmental Impact Statement for the Charles M. Russell National Wildlife Refuge.

I am very much in favor of Alternative "B", the "Proposed Action", which I understand would reduce livestock grazing by about 33% and give wildlife top priority on the refuge. It also is my understanding and belief that this conforms to the original intent in setting up the refuge.

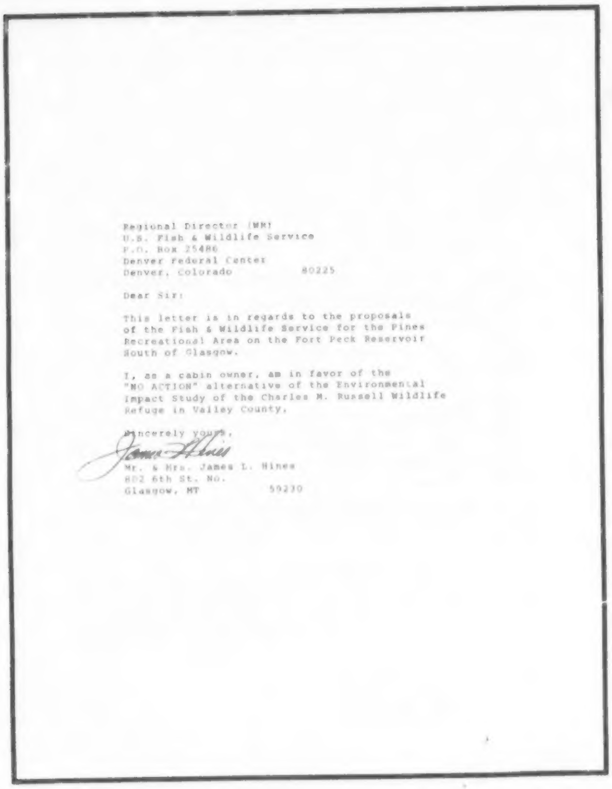
It is my strong hope that this alternative will be adopted.

Sincerely,

Cecil E. Gubser

Cecil E. Gubser

cc: Senator John Melcher
Senator Max Baucus
Representative Ron Marlenee
Representative Pat Williams



Regional Director (MR)
U.S. Fish & Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Sir:

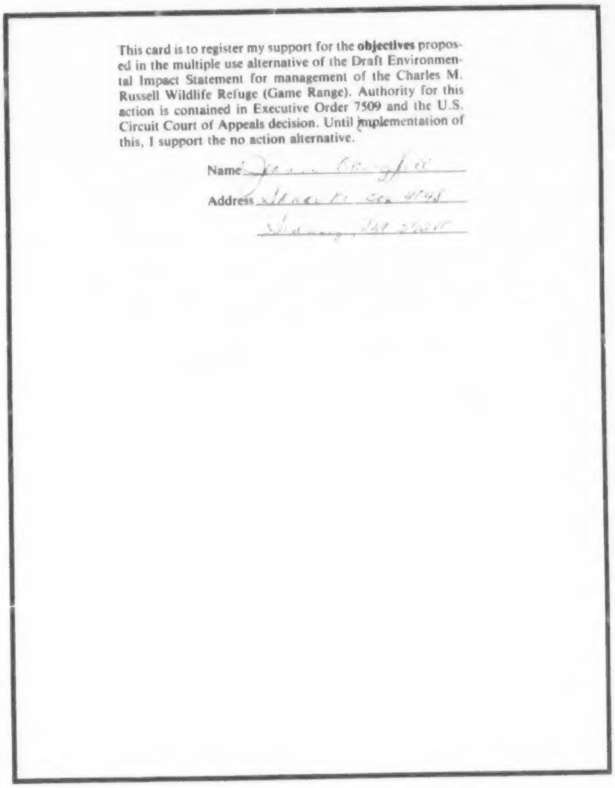
This letter is in regards to the proposals of the Fish & Wildlife Service for the Pines Recreational Area on the Fort Peck Reservoir South of Glasgow.

I, as a cabin owner, am in favor of the "NO ACTION" alternative of the Environmental Impact Study of the Charles M. Russell Wildlife Refuge in Valley County.

Sincerely yours,

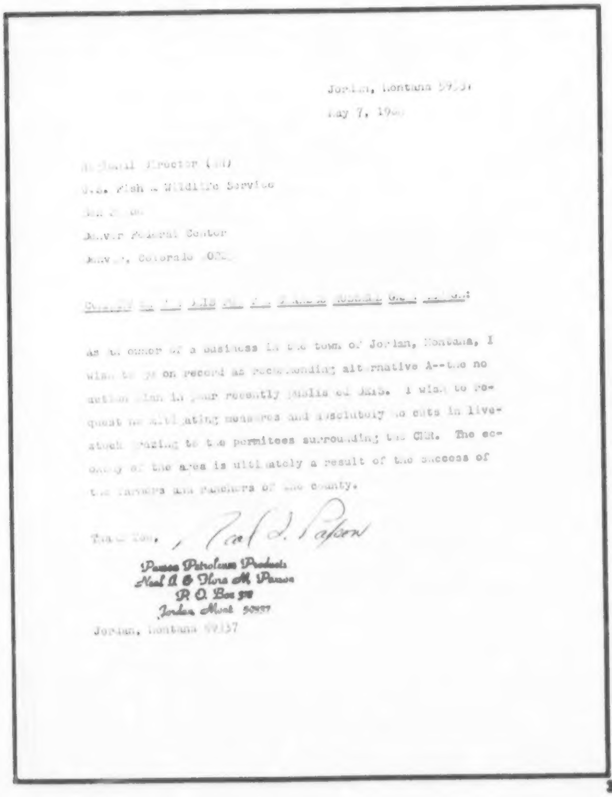
James Hines

Mr. & Mrs. James L. Hines
802 6th St. No.
Glasgow, MT 59230



This card is to register my support for the **objectives** proposed in the multiple use alternative of the Draft Environmental Impact Statement for management of the Charles M. Russell Wildlife Refuge (Game Range). Authority for this action is contained in Executive Order 7509 and the U.S. Circuit Court of Appeals decision. Until implementation of this, I support the no action alternative.

Name [illegible]
Address [illegible]
[illegible]



Jordan, Montana 59337
May 7, 1984

Regional Director (MR)
U.S. Fish & Wildlife Service
[illegible]
Denver Federal Center
Denver, Colorado 80225

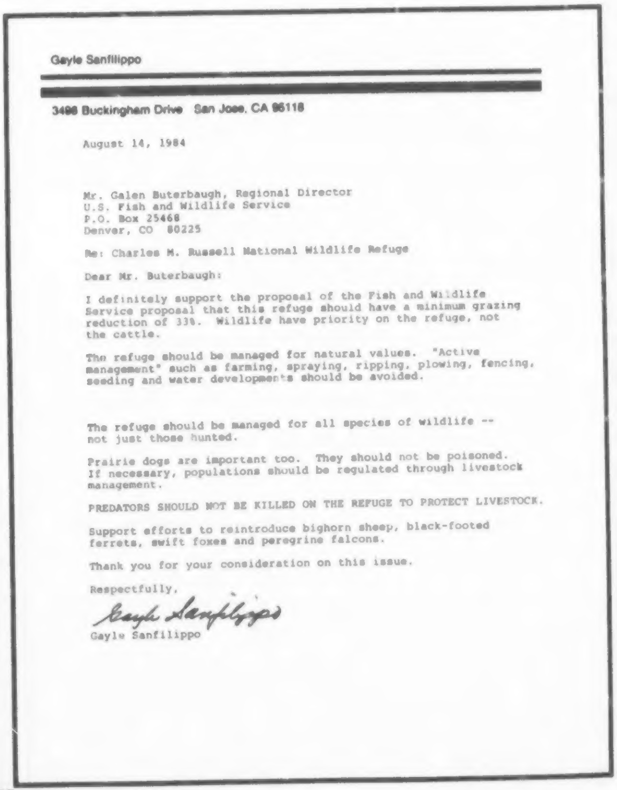
Comments on the DEIS for the Charles Russell Game Range:

As an owner of a business in the town of Jordan, Montana, I wish to go on record as recommending alternative A--the no action plan in your recently published DEIS. I wish to request no mitigating measures and absolutely no cuts in livestock grazing to the permitees surrounding the CMR. The economy of the area is ultimately a result of the success of the farmers and ranchers of the county.

Thank You,

Paxson Petroleum Products
Neal A. & Flora M. Paxson
P. O. Box 378
Jordan Mont 59337

Jordan, Montana 59337



Gayle Sanfilippo

3498 Buckingham Drive San Jose, CA 95118

August 14, 1984

Mr. Galen Buterbaugh, Regional Director
U.S. Fish and Wildlife Service
P.O. Box 25468
Denver, CO 80225

Re: Charles M. Russell National Wildlife Refuge

Dear Mr. Buterbaugh:

I definitely support the proposal of the Fish and Wildlife Service proposal that this refuge should have a minimum grazing reduction of 33%. Wildlife have priority on the refuge, not the cattle.

The refuge should be managed for natural values. "Active management" such as farming, spraying, ripping, plowing, fencing, seeding and water developments should be avoided.

The refuge should be managed for all species of wildlife -- not just those hunted.

Prairie dogs are important too. They should not be poisoned. If necessary, populations should be regulated through livestock management.

PREDATORS SHOULD NOT BE KILLED ON THE REFUGE TO PROTECT LIVESTOCK.

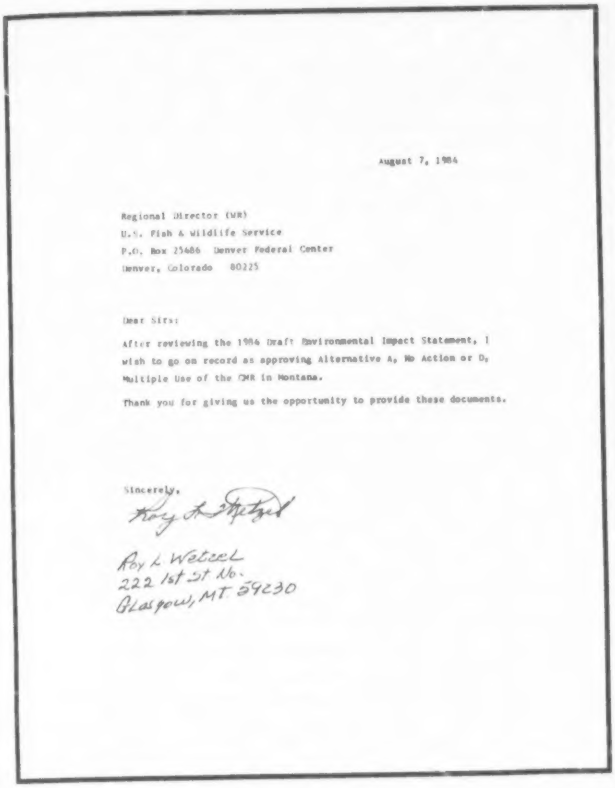
Support efforts to reintroduce bighorn sheep, black-footed ferrets, swift foxes and peregrine falcons.

Thank you for your consideration on this issue.

Respectfully,

Gayle Sanfilippo

Gayle Sanfilippo



August 7, 1984

Regional Director (WR)
U.S. Fish & Wildlife Service
P.O. Box 25486 Denver Federal Center
Denver, Colorado 80225

Dear Sirs:

After reviewing the 1984 Draft Environmental Impact Statement, I wish to go on record as approving Alternative A, No Action or D, Multiple Use of the CMR in Montana.

Thank you for giving us the opportunity to provide these documents.

Sincerely,

Roy L Wetzel

Roy L Wetzel
222 1st St No.
Glasgow, MT 59230

BEFORE THE

UNITED STATES DEPARTMENT OF THE INTERIOR

FISH AND WILDLIFE SERVICE

IN THE MATTER OF A PUBLIC)
HEARING ON THE DRAFT)
ENVIRONMENTAL IMPACT)
STATEMENT WHICH ADDRESSES) TRANSCRIPT OF
ALTERNATIVE PROPOSALS FOR)
MANAGEMENT OF THE CHARLES) PROCEEDINGS
M. RUSSELL NATIONAL WILDLIFE)
REFUGE IN MONTANA)

Tuesday, July 31, 1984
7:30 p.m.
Glasgow Civic Center
Glasgow, Montana

APPEARANCES:

ROGER THOMAS, Hearing Officer
BARNEY SCHRANCK
RALPH FRIES
LARRY MALONE
FRAN MAISS

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PROCEEDINGS

HEARING OFFICER THOMAS: Ladies and gentlemen, my name is Roger Thomas. If everyone wants to be seated we will try to begin. I am an attorney in the Office of the Solicitor. It's within the Department of Interior of the United States Government. I am located at Billings, Montana, and I have been designated hearing officer by the United States Fish and Wildlife Service for the purpose of presiding over this hearing.

This is a public hearing. Its purpose is to receive comments, either written or oral, that you may have to offer. It pertains to the Draft Environmental Impact Statement which addresses alternative proposals for management of the Charles M. Russell National Wildlife Refuge in Montana.

On March 21, 1984, the Fish and Wildlife Service gave notice advising the public that the Draft Environmental Impact Statement on management of the Charles Russell National Wildlife Refuge was available for public review, and they requested comments and suggestions. That Notice was published in the Federal Register on March 21, 1984, together with a summary of supplementary information relating to the proposed management actions and the major alternatives considered, analyzed and evaluated in that Statement.

We have here tonight a limited number of copies of that Draft Environmental Impact Statement. They are here for

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your reading and reference. Here is what they look like. We have about ten of them. You are welcome to come up, pick one up, read it, look it over. That's the limit of our supply, so we may have to share some.

It will be difficult to get through this lengthy document in five or ten minutes, but in the beginning of it there is a summary of the alternatives.

You might have observed that we have a recorder, a court reporter, over here on my left, your right, making a recording of the proceedings here, and don't--don't be afraid of the court reporter. That's--he is there for the purpose of recording your comments in case I or some of the officers of the Fish and Wildlife happen to miss a comment or not properly understand what you are saying and would have an opportunity later to study and analyze what you are offering.

A transcript of that recording will be included in the official record of this hearing which will be forwarded to the director of the Fish and Wildlife Service for use in preparation of the Final Draft of this Environmental Impact Statement, sometimes referred to as an EIS.

Now, at this point I would like to set out the rules that will govern this hearing and the procedures that we will try to follow. As mentioned, as you entered the meeting room you were asked to fill out an attendance record card like these. These cards will serve two purposes. They will give us a record of those persons who are attending this hearing and also they will furnish us a list of persons who wish to make a statement. They will be called first come first served.

If, as I mentioned before, if there isn't--if there is anyone who hasn't filled out a card raise your hand and we will try to get to you or go to the back table and try to register now, particularly if you wish to make a statement.

At the end of these proceedings I will offer an opportunity for anyone who wishes to make an additional comment who might not have registered in any event.

If someone needs to speak out of turn, speak first, they should let me know and we will try to accommodate them.

The purpose of this hearing is to receive your comments, to understand and try to comprehend what you have to say. It is not an adversary proceeding. It's not a debate. It's not a question-and-answer assembly. It's an advisory type proceeding. We wish to know what you have to say. It's to provide you with an opportunity to submit anv comments you have.

Now, I don't want to be unduly strict, but in order to assure everyone a fair opportunity to speak I am going to restrict comments to a time period of five minutes. I don't mean to be rude, but after four or five minutes have elapsed I may interrupt and not that the time has passed and it's time to wrap up what you have to say. If you can't fit your comments into that time, we ask that you please reduce them to writing and submit them to the Fish and Wildlife Service.

Are there any questions on those rules so far?

This hearing is one of three that's being held. All three were published in the Federal Register dated July 11, 1984. There will be one tomorrow night at Lewistown and one the night after in Missoula.

Admission of written comments should be made to the--to the Regional Director, United States Fish and Wildlife Service, Post Office Box 25486. That's 25486, Denver Federal Center, Denver, Colorado. Zip Code is 80225. If you want to get that after the meeting we would be happy to provide you with that address.

There are some officials of the Fish and Wildlife Service here with me tonight, and I would like to give you their names and their positions. First is Barney Schranck, Schranck. He is sitting over here on my right. He is the refuge supervisor for Montana and Wyoming. He is from Denver. Ralph Fries is on my left. He is the manager of the Charles Russell Refuge. He is out of Lewistown. Larry Malone in the rear of the building--he is the assistant manager and also out of Lewistown, and Fran--Fran Maiss--he is also an assistant manager of the refuge located out of Fort Peck.

To assist you in understanding what this is about or to bring you up to date on what this statement is trying to do and present, I have asked Ralph Fries to make a brief preliminary statement. Mr. Fries.

MR. FRIES: Good evening. I will just read you a statement we prepared. It's pretty short and somewhat of a history, but a lot of you are probably quite familiar with it, but some may not be.

"The Charles M. Russell National Wildlife Refuge was established in 1936 as the Fort Peck Game Range. The game range was administered jointly by the Fish and Wildlife Service and the Bureau of Land Management. This resulted in continual conflicts for forty years as the two agencies have different goals.

"For a short period in 1975 and early 1976 the area was managed solely by the Bureau of Land Management, but on February 27, 1976, the U. S. Congress passed Public Law 94-223 giving sole responsibility for management of the area to the Fish and Wildlife Service and changing the status from range to refuge.

"When the Fish and Wildlife Service accepted responsibility for management in 1976, it also accepted a part of a pending lawsuit that required an environmental impact statement, commonly referred to as EIS, be prepared.

"A special team was assembled and over a period of three years a Draft EIS was prepared. Public hearings were held on that Draft EIS in 1980.

"However, a court suit delayed the issuance of a final EIS.

"On January 14, 1982, U. S. District Court in Billings, Montana, ruled, quote, 'We have decided that the ranchers are entitled to have grazing declared a co-equal priority with wildlife conservation. Thus we must conclude that CMR must still be administered under the Taylor Grazing Act.' End of quote," from that decision.

"However, the District Court's decision was appealed to the United States Ninth Circuit Court of Appeals. On October 14, 1983, the Appellate Court overturned the District Court and ruled that, quote, '(1) Wildlife has priority in access to the forage resources of the range up to the limits specified in Executive Order 7509; (2) Beyond those limits, wildlife and livestock have equal priority in access to the resources of the range; and (3) The range is to be administered under the Wildlife Refuge Act.' End of quote.

"The Wildlife Refuge Act refers to the National Wildlife Refuge System Administration Act of 1966.

"Thus, it is clear that wildlife has priority on the refuge and the Taylor Grazing Act provides no rules or regulations pertaining to refuge operations.

"Due to a delay of several years, the Fish and Wildlife Service decided to issue a revised draft EIS. The public input received through earlier public review has been considered in preparing this draft EIS. The meeting tonight concerns this Revised Draft EIS.

"The refuge goals and the wildlife, range and recreational objectives are listed on Pages 4 to 6.

"Five alternatives are analyzed in the Draft EIS.

"The most controversial part of the Draft EIS is the grazing program. The five alternatives analyze the grazing program from no change to total elimination of grazing with three alternatives between these two extremes.

"The Fish and Wildlife Service is not opposed to grazing on the refuge. In fact, in the proposed Fish and Wildlife Service alternative, it is proposed that we graze about 40,000 AUM's per year. At present there are about 60,000 AUM's authorized for grazing.

"Also, from comments received on the first Draft EIS, it was apparent that many persons confused range condition and wildlife habitat condition. It should be remembered that these two items are not the same.

"Please remember the deadline for any written comments is August 15, 1984."

HEARING OFFICER THOMAS: Thank you, Ralph.

One other additional comment on procedure. I am going to ask that those who wish to be heard by all in the audience to speak at the podium here as Ralph has done and to save time I will name the first two speakers and the second

can come up and sit and be in waiting and the next person I will name will be the third after the first is finished, and so on.

Before I name the first two speakers I would like to recognize Ken Noland. He is the representative for the Honorable Ron Marlenee. He is available for questions and comments following the meeting, and so on.

The first two--oh, I might mention one other detail. Rest-rooms are over underneath the orange or yellow--you go underneath in back and to the right for the men and left for the women.

We will try to take a recess at an appropriate time.

If we may begin, then, the first two speakers, number one is Charles Carlson and number two is Wayne Putz, if I pronounced that properly, Charles Carlson and Wayne Putz.

MR. CARLSON: My name is Charles Carlson. I live in Fort Peck. I would like to make a short statement on the CMR Environmental Impact Statement both as an interested individual and as a member of Audubon. Also I know that there are many in town who agree with what I am going to say but who hesitate to speak out publicly for a variety of reasons.

First I would like to say that I think the CMR is one of the treasures of the wildlife refuge system. It is a natural resource and should be treated as such.

I think that Alternatives C, D and E, the intensive

wildlife management, multiple use and no grazing alternatives, are impractical and are expensive and that they will have high adverse impacts on too many users. Besides having these major faults, they do not comply with the executive order which established the CMR. That order required that forage which is excess to wildlife needs be allocated to livestock.

I feel that since the CMR is a national wildlife refuge it should be managed as a national wildlife refuge. Therefore, I would not think that Alternative A, the no change alternative, is a valid choice, since it sets livestock needs above wildlife needs.

I support Alternative B, the proposed alternative. This alternative addresses wildlife needs as well as maintaining livestock use as required by the executive order. Alternative B does not affect the cabin leasing on the lake; neither does it affect in any way fishing or boating on the lake. In addition, there is nothing in Alternative B which would adversely affect hunting on the refuge.

Thank you.

HEARING OFFICER THOMAS: Thank you, Mr. Carlson.

The next one would be Walt Collins. Please excuse me if I mispronounce your name. I am sorry. The one up to bat, I will say, is Wayne Putz.

MR. PUTZ: My name is Wayne Putz. I have been a rancher in this country for sixty years, and this EIS is just

a refried product of the first EIS which was produced by a coyote hunter from Utah.

The management of CMR should be left as it is today. It's working well. There is no need for any reduction in livestock grazing.

The economic projections are as fictitious as the whole EIS. Not only would the reduction of grazing put many ranchers out of business but it would also make many more borderline operators, whether they could continue to operate.

It does not take into consideration the terrific amount of damage done by--to ranchers' crops and hay meadows on private land.

The elk herd was a planted herd established with cooperation of the ranchers, which was a damn big mistake on our part.

You don't have wildlife as such anymore. They are spending more of their time on winter wheat fields, hay meadows and domestic crops and on private land and drinking water from our tanks and reservoirs. In winter when the snow is deep they are--are in our feedlots and on top of our haystacks. Ranchers are about fed up with this kind of one-sided abuse.

How any department can request a cut in grazing and then have the guts to perpetuate a prairie dog town of 10,000 to 20,000 acres of the most destructive animal on the face of the earth--not only do they eat every spear of vegetation, roots and all but they bring up all kinds and thousands of tons of dormant earth that lay dormant for years. If you don't think so, go out and check and look at some of the dog towns where the dogs were eradicated fifty years ago and they are still dormant.

After you have put ranchers out of business and deprived all of Eastern Montana of the only recreation area and cabin sites along Fort Peck Lake and when the snow is deep and the only salvation for wildlife is ranchers' feedlots and haystacks and thousands of animals that can't get there die of starvation, stand in front of your mirror and beat your chest and tell yourself what a wonderful game manager you are. If a rancher treated his livestock with such disregard, he would be doing time in the slammer for cruelty to animals.

I thank you.

HEARING OFFICER THOMAS: Thank you, Wayne.

MR. COLLINS: Good evening. My name is Walt Collins, and I am speaking on behalf of the Fort Peck Game Range Committee as their president. The Fort Peck Game Range Committee is made up of all permittees who graze livestock on the CMR.

We would like to present the following testimony in regards to the Draft Environmental Impact Statement on the CMR.

The proposed alternative in the DEIS would like to

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cut livestock grazing an average of thirty-three percent. Cuts vary from none to one hundred percent cut. Reducing the income of a rancher one-third is bound to have a tremendous negative effect not only on him but on where and on whom he spends his dollars. True, the direct effect will all be sustained by the ranchers, but indirectly involved are businessmen, livestock sales yards, bankers, and the tax base will be decreased due to lack of livestock numbers. In a depressed economy, less money available to be spent in mainly agricultural communities will not help anyone.

Presently, livestock and wildlife are cohabitating well together. Numbers have increased in the wildlife category. A good example of this is the increase in the elk herd.

These animals can live together in harmony. In fact, by removing livestock or even wildlife from the range will harm, not enhance, the forage available. There is a common known fact that grass will not grow if not grazed. There are areas in some allotments where neither wildlife or livestock have been where the forage growth is stagnant. When compared to where livestock and wildlife have been the forage available is better where these animals have grazed and reseeded the plants by the so-called trampling effect. This example advocates multiple use management.

How do the Fish and Wildlife know that the criteria set forth in Executive Order 7509, which established the Fort

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Peck Game Range, are not already being met? Have the Fish and Wildlife counted the antelope, grouse and non-predatory species to determine their numbers? Maybe this whole DEIS is unnecessary because there are 400,000 sharp-tailed grouse, 1500 antelope and such non-predatory secondary species to have a balanced wildlife population.

It could also occur that the Fish and Wildlife are increasing the burden of the range due to a combined wildlife population that is using range dedicated to the primary species. Do you actually know the wildlife numbers and have you evaluated the effects of wildlife on the range available for domestic livestock as provided for in Executive Order 7509?

These are some reasons we encourage management of the CMR to remain as present. If management does have to change, we request it to be the multiple use alternative.

Improvements as stated in the multiple use alternative would provide enhanced forage which would increase AUM's for both wildlife and livestock, therefore increasing your wildlife numbers, which you think is necessary.

Cooperation between permittees and the federal agencies involved would also be enhanced as we, the ranchers, are not losing our much-needed income and would not feel threatened.

Recreationists, hunters, cabin owners, et cetera, would still have the capability to use this beautiful land due

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to the multiple use concept.

The Fort Peck Game Range Committee would like to sit down with the Fish and Wildlife Service and come to an agreement that helps both sides. If this is not possible, we believe that the alternative that should be adopted is the no action alternative, but we would advocate adopting multiple use concepts.

Thank you.

HEARING OFFICER THOMAS: Thank you, Walt.

The next speaker is Charles Barnard. The next person on deck is Sever Enkerud.

MR. BARNARD: My name is Charles Barnard. I am a rancher in south Phillips County. I am a history buff and I think probably understand many of the--of the decisions that have been made on the Charles M. Russell National Wildlife Refuge.

I think that we should realize some of the history that's behind this.

Gus Hormay, noted range conservationist, stated that the range suffered severe damage by the vast herds of the cattle barons after the killing of the buffalo. It was too many cattle and too few water holes.

Next came the homesteaders with the stipulated requirement of breaking up the prairie sod to prove up their homestead. Within a few years many homesteaders left broken in dreams and pocketbook. Rather than dispose of their faithful horses they turned them loose. Horses, rabbits and prairie dogs multiply rapidly.

The late 1920's saw the elimination of the horse hordes.

The early 1930's, in spite of drought and depression, played a major role in the range renovation. The vast prairie dog towns were eliminated. The WPA constructed many reservoirs. Next was the systematic grazing and establishment of allotments by the Taylor Grazing Act. Fort Peck Dam was built. Fort Peck Game Range was created by presidential order for 400,000 sharp-tailed grouse and 1500 antelope and the stipulation that livestock grazing shall continue.

Under joint administration by the BLM and the Fish and Wildlife Service, the Fort Peck Game Range, later renamed the Charles M. Russell National Wildlife Refuge, the Fish and Wildlife Service was very reluctant to grant permission to construct reservoirs or fences to distribute livestock grazing. Thus the range on the CMR did not improve as rapidly as the adjacent BLM administered range. The CMR range was further depleted and destroyed by unrestricted growth of prairie dog towns.

In the Missouri Breaks fifty years ago you considered yourself lucky to see a deer track in a day and a miracle if you saw a deer. There were few antelope. Now deer are plentiful. Elk have been added through a joint venture of local ranchers, sportsmen groups and the Montana Department of Fish, Wildlife and Parks. Antelope have not recovered from the December 14, 1964 storm and the elimination of the use of 1080 and the consequential increase in coyote numbers.

If grazing is reduced or eliminated or under mitigating circumstances in Alternatives B, C and E where is the compliance with the executive order that grazing shall continue? Alternative E, no grazing, shows only contempt for the President of the United States. 2

In attempting to eliminate the grazing of livestock, domestic livestock, by abnormally high grazing fees on inferior range, restriction of numbers and the reduction of grazing rights when a ranch is sold, one very important aspect of life upon this planet is being overlooked. Grass and forage are the world's greatest renewable resource. They can only be harvested economically on such terrain as the CMR by the ruminant. They thus contribute to the world's supply of the rich renewable source of protein. If game animals were to harvest this resource exclusively under our present game laws, how much of this harvest would reach the masses?

Under Alternative B, proposed action, with its thirty-three percent reduction in grazing, are the AUM's already removed by the UL Bend Wilderness and the over ten sections of the de facto Herman Point Wilderness--were these considered in that reduction in grazing? The Herman Point Wilderness has not had any livestock grazing for over twenty years.

For the people of this nation there can only be one alternative for administration of the Charles M. Russell National Wildlife Refuge. That is the multiple use concept of multiple use management. It is the best and fairest for mankind and wildlife.

HEARING OFFICER THOMAS: Thank you.

The next person on deck is Barry Billingsley.

MR. ENKERUD: My name is Sever Enkerud, and I am speaking on behalf of the Wittmayer Grazing Association as their president. The Wittmayer Grazing Association is made up of twenty-five individual ranchers, that are located in Valley County.

We are to receive a fifteen percent cut in AUM's on range considered eighty-three percent good and seventeen percent excellent. In a community based on agriculture, any decrease in cattle numbers equals a decrease in dollars spent in the community. This results in a decrease of income received by businesses which is used to hire employees, donate to worthy organizations and in general to survive.

Also, the tax base of the entire county is decreased. This loss of income must be made up somewhere and it probably will be in higher taxes for the entire county. This cut will not only hurt the ranchers directly but the entire county indirectly. The ranchers involved need all the income they can produce to pay their many bills. A reduction in one herd could possibly cause him to go out of business.

I would like to point out some areas where the Wittmayer Grazing Association has enhanced both the private and public lands, creating better habitat for both wildlife and livestock, all without a reduction in either livestock or wildlife numbers. In fact, these improvements have increased the elk, grouse, antelope and other wildlife numbers. Our cattle numbers, by the way, have not been increased by us due to these improvements. Just wildlife.

We have developed wells, dams and springs amounting to an approximate total cost of $150,000. This cost has been directly paid for by the association members. These improvements have created better distribution of both cattle and wildlife. A rest rotation system was established that enhances livestock and wildlife habitat and number distribution. Range conditions are quite good, even in this drought. We have also seeded 2400 acres of crop land that would be producing wheat and barley back to grass, and the reason for this was due to the wildlife not staying out of the grain fields but coming in to eat on the grain early in the spring and continuing throughout the summer.

We are using a multiple use concept that not only benefits animals but gives people the opportunity to use these public and private lands. People are allowed to hunt on our private lands. Recreationists are allowed to use our private roads to get to public lands. Anyone and everyone is welcome on our association and these people have treated us well. I don't think this cooperative attitude will be in evidence if the proposed alternative is adopted in this Draft Environmental Impact Statement. Multiple use works well when all parties recognize the need for all aspects of humanity to work together, not to su[illegible] only one side.

I would like to add that the Wittmayer Grazing Association is Farmer Home Administration financed. We believ it is detrimental for one government agency to work against another. The association has always made their annual payment on time and in the full amount. If our numbers are cut, we might not be able to do so.

The Wittmayer Grazing Association would like to work with the Fish and Wildlife to come up with a solution that will benefit all parties involved. That is why we would recommend adopting the multiple use alternative, which does benefit all parties involved, instead of the preferred alternative.

Thank you.

HEARING OFFICER THOMAS: Next person is Marlyn Orahood on deck.

MR. BILLINGSLEY: My name is Barry Billingsley, and

I am speaking on behalf of the Silver Dollar Grazing Association. It is made up of seventeen individual family-size ranches. We run on the Charles M. Russell Game Range twenty miles southof Glasgow on the west shore line of Fort Peck Lake.

The Fish and Wildlife is proposing to cut our AUM's forty-seven percent on range that is considered one hundred percent good. This cut of grazing rights will be devastating to the ranchers involved. The local agricultural suppliers will suffer immediately. The multiplier effect on this agricultural community will be in the hundreds of thousands.

The Silver Dollar Grazing Association presently is running under a rest rotation system. This creates a better utilization of the range. The cattle are better distributed, there is less interference with wildlife and there is better use of forage by the wildlife and livestock.

The members of the grazing association are firm believers in the multiple use concept. We feel this alternative would best serve the needs of the Fish and Wildlife, the grazing association, recreationists, hunters and other members of the public who use the Charles M. Russell Game Range. Multiple use benefits not only people but wildlife and livestock. Due to this reason, we would request that if the no action alternative is not adopted the multiple use alternative be considered and used.

Again, I would ask the proposed alternative in the Draft Environmental Impact Statement be dropped and either the no action alternative or the multiple use alternative be adopted. If the no action or multiple use alternative is chosen, the Silver Dollar Grazing Association would be glad to cooperate with the Fish and Wildlife and other government agencies involved to devise a workable plan that all parties can live with.

HEARING OFFICER THOMAS: Thank you.

Next person on deck is Beverly Lawson.

MS. ORAHOOD: Good evening. Do we have to turn this up louder or lower?

HEARING OFFICER THOMAS: We can hear you fine.

MS. ORAHOOD: Good evening. I am Marlyn Orahood from Malta, Montana.

My husband, Wesley, and I want the Charles M. Russell National Wildlife Refuge left just as it is now. We want it left just as it is now because there are absolutely no guarantees of what we would get if the management of the refug was changed. We ranch south of Malta in Phillips County, but we do have a personal interest in the management of the CMR because we are in the Wittmayer Grazing Association.

There is one group of people in the United States--the farmers and ranchers who feed the world. These people are the poorest paid for their labor and their products. People

who work the soil generate what the economy will be world wide. Farmers and ranchers make it necessary to have our food stores, our clothing stores, machinery dealers, newspapers and any other line of business that you are concerned with or can thin of that someone makes a living at in this world.

There are other users of the soil or natural resources, such as timber men, the logging industry, mining, coal, copper or precious metals, the oil industry, our laborers who contribute towards maintaining the national and world-wide economy.

The Federal Government through its bureaucracies is working very hard to undermine the well-being of the most important industries in the world.

The farmers and ranchers are always under attack fro groups of people that do very little for the total economy of our nation and our world. Government agencies seem to delight in working against those who are paying their, the Government bureaus', astronomical bills and the wages of those who work for them.

Several people have talked to me about lowering the taxes that are paid by the property owners. These same people think that a lot of their hard-earned cash is being spent irreverently by the Federal Government's bureaus. To eliminat the attacking front that is set up by the Federal Government, perhaps our Federal Government should eliminate the Fish and

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Wildlife Service and the Fish, Wildlife and Parks and go back to funding Health, Education and Welfare. Education really needs funding. The United States is built on well-educated people.

The people who use the land are the best conservationists and environmentalists. A strong United States wasn't and isn't built on people making jobs for themselves to keep their bureaus.

Those people who are very rich and looking for a place to invest their money seem to want to support the so-called environmentalist groups. More than likely their money has come from using the land, streams and air too harshly and now want to make amends for raping the environment.

People who need the land to make a living for themselves and be able to support all of the rest of the people know that we need to use what is on this earth very carefully. We who work on and with the land have always taken time to smell the roses. We appreciate the land for what it has to offer: The habitat plus the wildlife that occupy the habitat.

People who run on theory and a lot of theoretical technology and education have not had practical and logical knowledge and experience about how to make our environment work.

Now through the mismanagement of the federal agencies, like the Fish and Wildlife Service's, our grain fields,

alfalfa and alfalfa seed fields and our grazing are completely run over by antelope, deer and elk. The farmers and ranchers know that elk, deer and antelope will not eat old grass to get to new grass, so these animals have come out on our grazing and worked to the farming fields to get to new green grass.

C. M. Russell Wildlife Refuge needs livestock to graze the old grass; then the wild animals have a chance to survive on this wildlife refuge. As far as coverage for the bird habitat there is still plenty of brush, deep coulees, trees and grass for them.

If the Fish and Wildlife Service had followed the executive order and sustained in healthy condition a maximum of 400,000 sharp-tailed grouse and 1500 antelope and such non-predatory secondary species to maintain a balanced wildlife population, this EIS would not have had to be written or even a concern now.

Through mismanagement and several federal agencies making their own set of rules the actual reason for having the C. M. Russell Wildlife Refuge has been lost, and because these agencies listened to unsound advice from those who haven't had actual experience when it came to using our land the Fort Peck Game Range doesn't even resemble the original intent that Franklin Delano Roosevelt had in mind when he made Executive Order 7509.

Leave the C. M. Russell Wildlife Refuge as it is now.

The wildlife need the livestock to maintain the balance of nature that was ordered.

One more thing. In reference to my letter found on Page 336 of the 1984 EIS, when I responded to the 1980 EIS, I disagree with the Fish and Wildlife Service's response to my letter. Predators are not prohibited. Rather they are not mentioned.

It says "Such non-predatory secondary species." Please refer to Page 159, the Executive Order 7509. Non-predatory means not a predator.

Thank you.

HEARING OFFICER THOMAS: Thank you.

MS. LAWSON: All of my points have been covered. Thank you.

HEARING OFFICER THOMAS: Is that Beverly?

MS. LAWSON: Yes.

HEARING OFFICER THOMAS: All right. The next person to speak then is Dave Huston. Did I pronounce that properly? And the person on deck would be Gregory Pauley.

MR. HUSTON: I am not speaking for myself. The county commissioners of Garfield County asked me to read their statement here, which I will do. This is not my statement. I will give that tomorrow night.

"The Garfield County Commissioners are deeply concerned about some of the possible outcome of the DEIS if any

of the alternatives listed are implemented except the Alternative A, no action alternative.

"We are in a sixth class county with only $6,759,624 taxable valuation which is one of the lowest in the state. If the other alternatives were implemented it could further reduc livestock numbers as well as jeopardize greatly the operations and existence of the affected ranchers. This would also put a greater tax burden on the remaining taxpayers of Garfield County to pay for schools, roads and other services that are needed.

"As a rancher myself with a grazing allotment on the CMR, I would also be personally affected. By eliminating or reducing multiple use on the CMR, it would do little or nothing to enhance the wildlife because of the harassment and predatio of predators. The ranchers in Garfield County, as well as the Fish and Wildlife animal damage control agents, spend a lot of time and money protecting livestock from predators that are raised on the CMR, then move onto private property, where predator control is being applied. Reducing livestock numbers on the CMR will not improve wildlife habitat when they are not there.

"Your full consideration on this matter would be greatly appreciated. Sincerely, John E. Trumbo, Kenneth Coulter and Ted Schmidt, Garfield County Commissioners."

HEARING OFFICER THOMAS: Thank you. Next person on deck is Manson Bailey, Jr.

MR. PAULEY: I am Gregory L. Pauley. I am the executive secretary of Walleyes Unlimited of Montana. We have over 4,000 fishermen that are interested in developing the warm and cool water fishing in our state.

The Fish and Wildlife--I do think the first word there is "fish"--since they have been into the CMR they have done very, very little to develop any fishing, and we sometimes wonder the reasoning. They are worried considerably about the black-footed ferret. Yet the walleye, in our estimation, is almost as scarce and has received no attention. Nobody goes out and sits three nights in the dark holding a flashlight to see if the walleye surfaces.

We also would like to know when you have a shore line the size of the State of California why you only have seven accesses and one more proposed. If the State of California only had seven accesses they would not have the olympics this year. It seems that if you are going to realize potential of maybe a half a million dollars, which is what it is in North Dakota in terms of fish and revenue, that we should have more proposed accesses and mainly accesses that would have a fairly good all-weather road to a decent boat ramp. Right now as far as we are concerned we have seven places you can drive a car and take a boat in. The rest of them are pretty much limited in all types of weather to a 3

backpacker with a float tube, and we don't fish trout. We fish walleye.

I would think that the best alternative would be the multiple use alternative, which would develop Fort Peck. It's a sleeping giant, and I think that people could get a lot more out of it. The ranchers need it; the fishermen need it; everybody needs it. We don't need a place where you build a big fence, keep everybody out and show it to the rest of the world.

Thank you.

HEARING OFFICER THOMAS: Next person on deck is Jack Billingsley.

MR. BAILEY: Solicitor Thomas, this is addressed to Mr. Galen Buterbaugh, Regional Director, U. S. Fish and Wildlife Service in Denver. It's to be entered in the record as testimonial response to the Charles M. Russell National Wildlife Refuge DEIS dated 2-23-84.

"Dear Mr. Buterbaugh: In accordance with our executive board action--pardon me. I am Manson Bailey, and I represent Valley County Development Council.

"In accordance with our executive board action June 19, 1984, I was designated as the executive director to present this statement as it applies to this 1984 DEIS.

"This organization was designated by the Valley County Commissioners in 1968 as the Overall Economic

Development Program Committee and has a county-wide coordinating and planning position in association with various organizations, special committees, cities, towns, county, state and federal departments and agencies. A considerable portion of this is directed to our natural and renewable resources as priority subjects.

"Board action was to support Alternative A, no action, as found on Pages 7 and 8 of the CMR-DEIS, 1984. It is here recognized that the Fish and Wildlife Service personnel have expended considerable effort in compiling this material and recommendations. However, as in the first DEIS and as presented, none of the alternatives will gain a clear consensus.

"Multiple use is the term of management locally identifiable but not as written. It has been the theme of accomplishments over the past half century through a great cooperative effort. It is the consensus of many that the authority for this is presently available without further congressional action.

"The connotation of no action seems to imply that there has been no progress in the role of wildlife in the past nor would there be in the future if this alternative is followed.

"As a part of the DEIS there are printed statements by many registering their thoughts on the first DEIS. They cover a broad spectrum of interests all viewing it from their

hill of observation. Many from far distances have no idea of what it is really like.

"For some personal observations may I ask you to ride to the hill from which I have viewed the progress over the past fifty years with over thirty years in public service and the horses I have ridden to get here? It has been my privilege to have served on the County Soil Conservation District Board during a time of considerable total resource development, which included benefits to wildlife, 1951-1957, appointed to the Montana Fish and Game Commission 1952-1956 through a period which opened the door for wildlife biologists to be part of the team in the field, a time which brought wild turkeys to Montana, trout fishing to ponds and the people of Eastern Montana, observing the first pinioned Canadian geese broods to further establish that species in this area, over the past fifty years observed the Fort Peck Game Range, now CMR, go from the sharp-tailed grouse and antelope of that day of drought to one of abundance of many species. There were no mule deer in Eastern Montana; now they abound throughout the CMR and the prairie lands of our state.

"The introduction of elk to the CMR in the winter of 1951-52 was a cooperative effort of the large sportsmen's clubs of that day in Eastern Montana and the ranchers with numbers far exceeding what was agreed upon. It must be noted that this abundance of wildlife on the CMR has been accomplished in joint use by domestic livestock and that it was the ranchers who first initiated better range management through the instrument of the Taylor Grazing Act, State Grass Commission and local grazing districts. I will note that not all ranchers follow the rules just as not all administrators of public trusts do.

"We would ask those not of our area to further consider that we of Eastern Montana look to the Fort Peck Lake and its environs as our recreation area and there were some sacrifices that all may enjoy it. There were some 669,800 acres of private lands purchased in the total project in six counties. The tax base on these lands for those counties is forever lost.

"Through the cooperative efforts of congressional delegations, Corps of Engineers, State of Montana, the Fish and Wildlife Service, county governments, civic organizations and untold numbers of individuals have and continue to work for improvement of the broad scope of beneficial use of these resources. There is still room for give and take to achieve many of the wildlife goals listed with a compatability with other uses.

"Thank you for the opportunity to present this information."

HEARING OFFICER THOMAS: Thank you.

The next person on deck is Lucille Triedl or Friedl.

MR. BILLINGSLEY: I am Jack Billingsley.

I wish to support the objectives proposed in the multiple use alternative of the Draft Environmental Impact Statement for management of the Charles M. Russell Wildlife Refuge. Authority for this action is contained in Executive Order 7509 and the U. S. Circuit Court of Appeals decision. Until implementation of this I support the no action alternative.

My family, friends and out-of-area visitors have enjoyed the natural scenic beauty, wildlife and western atmosphere of the livestock and the harmony that comes from the sharing of the resources as they now exist.

There has been adequate wildlife to provide a quality hunt for our local and out-of-state hunters. A number of livestock raisers depend upon a share of the resources to make a livelihood.

Because the area is agricultural, farmers, ranchers and businessmen depend upon ranching and farming resources to support their families, business and a tax source to support local government, schools, roads, and so forth. If livestock numbers were cut, it would lower our tax base.

Camping, vacationing and hunting gives a feeling of well-being to local residents and visitors. We have learned to appreciate this as a way of life we wish to share.

There is no guarantee that the other alternatives

suggested would be successful. Change does not always bring the anticipated blessings.

The no action policy would add to the economic growth of the area, state and nation. Any other changes could cause an adverse economic burden.

HEARING OFFICER THOMAS: Thank you.

Next person on deck is Martha Volkomener.

MS. FRIEDL: Good evening. I have been listening to all of these talks and I agree wholeheartedly with all of you. I think that during the past many years we have had a wonderful relationship with the Corps of Engineers and with the Fish and Wildlife Service. We have gotten along very well with them.

My husband back in 1944 had the first cottage site out on the lake, and it has been a source of great joy and happiness to us.

The people of Eastern Montana are so well aware of the fragile nature of this area that we want to protect it with everything that we have. We are willing to share with the wildlife. In fact, we love the wildlife, and that's one of the finest things we have about the joys of having a cottage along the lake shore.

We also recognize that it is necessary to have some controls but, believe me, in all of the conversations I have had with people in the past several years everyone that I have

talked with has been in total agreement with me that the Corps of Engineers is doing a fine job, and so is the Fish and Wildlife Service, and we would like to see it stay just the way it is.

Thank you.

HEARING OFFICER THOMAS: Next person on deck is Gene Etchart.

MS. VOLKOMENER: I am Martha Volkomener, and I am also a cabin owner at the Pines and have been since 1970. My comments tend towards the cabin owners and recreational uses, but I do fully appreciate the ranchers' position and I certainly do support them.

I do firmly believe that the C. M. Russell Range should closely follow as it is now operated and that all of the facilities and activities, be it recreational or agricultural, should be continued or expanded to allow more public use if it were possible. I would want all public areas, be they marina, cottages, camping areas, lake control and such to remain under the control of the Corps of Engineers. Their service has been very cooperative, in my opinion. I feel that the private cottage areas have actually been improved by the privilege of those of us who have been able to enjoy them.

If anything more than the first alternative of no action is considered I would probably favor the Alternative D, the multiple use, as long as it assures that all the present uses continue as they are now in effect to the Corps and to all of those facilities--BLM, Fish and Wildlife and whoever they may be, who have--have cooperated when we have had fires in the area out there. I would like to personally thank each of those organizations that have been involved.

We do our best, but we are just a small group, and they have really come through on all the fires so far. I hope we don't have any more, and thank you very much.

HEARING OFFICER THOMAS: Thank you.

Next one on deck is Marlene McVee.

MR. ETCHART: Mr. Hearings Officer, my name is Gene Etchart of Glasgow, Montana. You have it on the card.

My testimony here today would be to support the Alternative A and if that's not possible the Alternative D or a combination of both, and I would oppose the proposed alternative advanced by the Fish and Wildlife Service, that alternative being the one that would cut the livestock numbers and it would threaten the tenure of the cabin owners and other multiple use users.

I would commend Fish and Wildlife Service for offering an alternative which, in effect, would endorse, as I see the Alternative A doing, that would endorse the present management that's been in effect for all these years.

I had the occasion to discuss with Senator Metcalf shortly after the legislation that Mr. Fries mentioned--with

the senator as to what might be the implications involved insofar as the user was concerned. He told me to bring back the message to the people here that anyone having a legitimate use on that range had nothing to fear, and I think that it would behoove the Fish and Wildlife Service to read and to interpret some of the history of that legislation, because I think that was the intent of the Congress.

I have been told by Dr. Jack Taylor, who is the head of the Range Science Department at Montana State University, that he was one of the people who evaluated the condition of the range on the refuge and that he found all except for small pockets of the range to be in excellent condition.

The wildlife on the CMR has enjoyed a good environment for the last forty years. They also enjoy a good environment on the area adjacent to the refuge. A significant percentage of the total habitat, both on--on the game range and adjacent to the refuge, is owned and provided at no cost to the game agencies by private landowners who are also permittees on the refuge.

It would seem to me to be totally unfair to penalize these operators with a significant cut in the grazing capacity and in return for their donated contributions to the overall available wildlife habitat.

Likewise, the significant cuts that have been mentioned would certainly have an adverse ripple effect on the

economies in the counties adjacent to the refuge.

In conclusion, I would like to go on record as supporting Alternative A, that being no action, or the present setup, and if not that D, which is the multiple use alternative, and to oppose the preferred alternative as offered in the EIS by the Fish and Wildlife Service.

Thank you.

HEARING OFFICER THOMAS: Thank you.

After Marlene McVee is Senator Mark Etchart.

MS. McVEE: I am Marlene McVee of Glasgow. My husband, Charles, and I are in the livestock industry north of Glasgow.

We are not grazing our cattle on the Charles Russell Refuge but we are grazing cattle on federal land and we are sympathetic with our rancher friends who are grazing cattle in that area.

The economy of our area is already at a low level and everyone will be affected adversely by your proposal to reduce grazing on the Charles Russell Game Range.

We stand united, my husband and myself, with the ranchers, businessmen and sportsmen of our area who recommend Alternative A, no action at the present time, until the multiple use alternative can be agreed upon.

HEARING OFFICER THOMAS: Thank you.

After Senator Mark Etchart is Don Beckman.

SENATOR ETCHART: Mr. Solicitor and fellow people at the hearing today, tonight, this is my statement to the U. S. Fish and Wildlife Service.

First of all, I want to thank the Fish and Wildlife Service, Congressman Marlenee, Senator Baucus and Senator Melcher for holding this public hearing to give the people of the area a chance to be heard on the Draft Environmental Impact Statement for management of the Charles M. Russell Wildlife Refuge--Game Range.

Your response to my letter of October 30, 1980, which is printed in the DEIS, says that the economic impact to the region will be insignificant. I can assure you that this is not correct and I think that if you check with the banking community you will find that they agree with me. Prairie dogs and wildlife habitat per se do not pay taxes to educate our school children nor do they spend money for pickups, machinery, repairs, gas and oil and the other things that keep a viable economy for the people.

This DEIS seems to suggest that habitat can best be improved by decreasing livestock grazing. Hermay, Savory and others disagree. See the Great Falls Tribune, Sunday Supplement of July 29, 1984, an article entitled "The Holistic Range." DEIS theory further suggests that game production will increase, that predators will not be controlled to protect game. I say this will cause game to decrease instead of increase, and thus about all that will be gained from sacrificing our local economy is to raise more coyotes and prairie dogs. With a federal deficit of 200,000,000,000 plus we can hardly afford this type of thinking.

I want to reaffirm my letter of October 30, 1980, for the record and further state that I do not agree with the forty-seven percent reduction in CMR grazing for Etchart Ranch in the Carpenter Creek Allotment on range that your surveys show to be ninety-six percent good to excellent in condition. The suggestion that a large area of our Timber Creek pasture should be cut one hundred percent is based on an unproven theory. This is contrary to the facts concerning the condition of the range, the game production there and the existing historical use livestock have made of the area. We call upon you to bring forth scientific proof for your actions before drastic and damaging cuts like these are made.

Your final action should be to adopt the September 29, 1980--see the DEIS--letter from Senator John Melcher and Congressman Ron Marlenee, which states, and I quote, "A new alternative should be developed which provides for range improvements and improved grazing systems along with some season of use modifications that would provide enhancement on the domestic livestock grazing program proposed in the presented Draft Environmental Impact Statement," unquote. Senator Melcher and Congressman Marlenee further suggested that you,

quote, "recognize the domestic livestock grazing as a legitimate use of the refuge instead of treating it as a threat," unquote.

Senator Baucus in his statement on that DEIS says, quote, "I am urging the Fish and Wildlife Service to examine further any alternative for improving wildlife habitat other than the suggested thirty-three percent cut in AUM's on grazing allotments," unquote.

My suggestion is that the Fish and Wildlife Service adopt Senator Baucus', Senator Melcher's and Congressman Marlenee's suggestions and further incorporate provisions in Alternative D, multiple use, which would increase local employment in the tourist industry by forty percent by year 2005 and also add $1,653,392 to sales with thirty-seven percent increase in area employment.

In conclusion, I support the multiple use management of the CMR. I dispute DEIS statements alleging that these management options are not available at this time. I further contend that Executive Order 7509 and the Ninth Circuit Court of Appeals decision contains all the authority and flexibility needed for a reasonable, workable, viable and sensible management of the Charles M. Russell Wildlife Refuge--Game Range. The no action option would accomplish this, also.

Thank you.

HEARING OFFICER THOMAS: Thank you.

After Don Beckman is Ralph Dreyer or Dreyer.

MR. BECKMAN: I am Don Beckman, and I live in Nashua. I support the no action plan and for the simple reason that it has the least damaging effects to our local people at this time.

I feel that I can offer a suggestion or two which may be helpful; in previous hearings it's come up, and again it is here tonight. I feel that the people who design EIS's and make the plans do not give sufficient attention and weight to the people who make their thoughts known at the hearings. These people have fairly well shown that they don't approve of certain sections of the plan and have given reasons why, and for that reason I think that a better plan can be obtained.

When you design an automobile or a computer you don't design it for someone in a far-away country to use. You design it for the users, and my advice here tonight is to listen to the people who use the refuge and design your plan to fit their needs, and I thank you.

HEARING OFFICER THOMAS: Thank you.

After Ralph Dreyer is Francis Gallagher.

MR. DREYER: My name is Ralph Dreyer, originally from Circle, Montana, but at the present time I live in Glasgow.

I have been a rancher, worked on ranches, for forty-some years. The first year I ever saw on a ranch was in 1943.

About 1948 we got 1080 in control of the coyotes. The deer and antelope population grew by leaps and bounds. This can be checked through the permits and licenses that were sold at that time by the Montana Fish and Game Department. We have had bad weather that has killed deer and antelope in this area as well as others.

I would like to take an example of about two hundred sections that lie from McGuire Creek on to Flowing Well, which includes Nelson Creek and Timber Creek. In this area there is approximately four or five to six thousand head of sheep beside cattle and horses that live and graze on this particular area, and you can check by the amount of licenses and permits today that are in this area. There are permits for antlerless deer, which are does, and, of course, there is several antelope permits. There is approximately about one hundred sections that are fenced sheep tight, but still the antelope and deer are on this range.

Why are they there? Because there is where they have their food. There is where they want to be. There is where they multiply. There is where they are hunted, so I cannot see why they want to kick all of the sheep off of the Charlie Russell Game Reserve when you have a place that you can document what I am saying.

I have controlled prairie dogs in this area and still am for forty some years, and they are being seeded out with new towns of prairie dogs. Why? Nelson Creek is overrun and part of that dog town, if I were to try to operate a ranch with the amount of grass that is on that, they would die. Not even sheep could live on it.

I am absolutely opposed to the B portion. I would certainly go along with the A and then the B, and kind of what makes me mad somebody thought there was black-footed ferret in that area, and due to his thinking and no proof is one reason why we have the destruction of a lot of the grass on Nelson Creek, and these dogs go on up to Timber Creek, McGuire Creek and therefore.

Thank you.

HEARING OFFICER THOMAS: After Francis Gallagher is James Rector.

MR. GALLAGHER: Mr. Hearings Officer, my name is Francis Gallagher. I live in Glasgow. I am an attorney but I am here in my individual and private capacity tonight. I had written down a few items to mention here tonight, but most of what I was going to say has already been said by others, so I will restrict my remarks to one item, and that has to do with the mission and the goals and priorities for the CMR as envisioned by the Fish and Wildlife Service as set forth on Page 4 of the Environmental Impact Statement.

Item No. 5 under the list of goals in priority order is a reference to livestock grazing when it's compatible with

the wildlife and habitat goals, and No. 11 is a vague reference to coordinating and integrating where feasible the management of the CMR to accommodate the needs of federal and state agencies and private landowners. It seems that the status given to livestock grazing in President Roosevelt's 1936 executive order and in the court decision, the Federal Circuit Court of Appeals, in 1983, have virtually been ignored in the statement of goals and the priority listings of the Fish and Wildlife Service for the CMR range.

I would have hoped that the Fish and Wildlife Service would have seen fit in their statement of goals for the CMR to have given the status to livestock grazing as was envisioned by the executive order of President Roosevelt in 1936 and as envisioned by the Circuit Court of Appeals in 1983.

Thank you.

HEARING OFFICER THOMAS: Thank you.

Following James Rector is Steven Page.

MR. RECTOR: My name is Jim Rector, and I am an attorney here in Glasgow. I am not here speaking as a representative of any group or party. I am here speaking on my own behalf.

I am a user of the refuge area many ways directly, many ways indirectly--first of all, indirectly as a businessman here in Glasgow. Of course, my future, my economic future, if you will, is tied directly to the economic future

of this area and, therefore, indirectly I am greatly affected. Directly, I happen to be a cabin user. I hate to say cabin owner because I don't think anybody is a cabin owner in the Pines area. I also am a member of Walleyes, Unlimited, and I like to fish for walleyes. Unfortunately, we don't get to catch a lot, and I am a hunter, and I spend a great number of hours on refuge each year in that recreational capacity.

First of all, I would like to state that I am opposed to Option B, Alternative B, primarily for, well, a lot of reasons. First of all, there is the economic impact, and I think we have had that very clearly demonstrated here tonight that there is going to be a severe economic impact to this action, and I guess I would like to see not only an environmental impact statement but I would like to see an economic impact statement so that we or so that those persons who are supportive of maximum wildlife habitat options can realize what it's going to do to the persons who are in the immediate area.

One other thing bothered me a little about that statement concerning cutting back of the grazing was that there was--I am sorry I didn't bring my copy with me, but there is something in there that insinuates there will be no further cuts in grazing so long as there are no conflicts, which seems to insinuate to me that if there are conflicts there will be further cuts in grazing, and I guess I would lik

to have some sort of delineation on what those cuts might be.

One of the other things that bothers me about this proposed alternative is that the reintroduction of endangered species--I hate to say it that way, because that prints you as being a black guy if you are against the black-footed ferrets and falcons and that sort of thing. Maybe some of those endangered species are endangered for a reason. In other words, dinosaurs aren't here, and there is probably a good reason why. I guess that doesn't bother me so much, but what does bother me I think incumbent with the introduction of those endangered species that insinuates they are going to have vast areas of refuge that are going to be locked up. We don't want to call them wilderness areas because they aren't going to be wilderness areas. They are going to be locked up, and I think you are going to have a defacto wilderness area, and that is going to mean total exclusion of all users, whether it be grazing users or whether it be recreational users, and that bothers me a great deal. It doesn't say what they intend to do when these species are reintroduced, and I would like to know just how big an area of the refuge you intend to lock up.

Further, there is a discussion in there about boundary fencing, and I guess I see some benefits to boundary fencing probably in some areas. It's a very good idea to properly district the grazing allotments, and that sort of thing, but, here again, I think an economic impact statement would be in order. I know that boundary fencing or fencing per se is very expensive, and I am sure there are many people here in this audience would be glad to stand up and tell you what it costs per mile to lay fence, and I wonder what is the benefit of that fencing. I am a taxpayer, too.

There is another statement in there that bothers me a little bit, and it says here again there will be no--no change in management unless it conflicts with wildlife habitat or something to that effect, and here again it seems to me like we are leaving a very large door open for some very large future changes in management that we may not have anything to say about. Even though we do have something to say about it today I don't know how effective our voice is going to be. At least we have the opportunity to be heard.

Fires is another area that bothers me a great deal. They intend to leave wild fires burn or controlled burns. That here again insinuates to me we are going to start a fire. I certainly hope that isn't the case, and I would like to know where they plan to burn those fires. If they are going to burn them on fifth, sixth, seventh points, I am going to be a little upset about it, because those trees take a time to get there.

They say private land--the private land exterior to the refuge would be acquired. Well, I would like to know just

how you plan to accomplish that. That they said would be accomplished something like 2005. In my experience, whenever a federal or state or other agency decides that they want to acquire private land that means condemnation, and I guess I would be a little concerned about condemnation of private land within the refuge. I know there is not a great deal of private land within the refuge as percentage of total acreage, but I think if you talk to Don Burke about it what is there is very near and dear. You might have a very hard time trying to convince him he ought to sell that land.

I guess in reviewing the alternatives I would like to say I am in favor of the multiple use alternative, but I am not so sure I really am. What I am in favor of is the present plan of management, not no action.

I think Manson made a very good point earlier that no action infers that we are not going to do anything, and I don't think that's the case. I think that the plan that we have had, the management that we have experienced, has been very productive, very fruitful and has allowed for the multiple users to get some benefit from the use of the wildlife refuge. I think it has been shown that it has been very effective for wildlife habitat management; witness a number of wildlife species available and the quantity and quality of them that are there today that weren't there several years ago.

My grandmother--she homesteaded south of--south of

the Bear Paw Mountains in Chinook of Blaine County, and she took me out there to the homestead one time, and she was telling me about eating mutton all winter long. I said, "My goodness. Why didn't you eat venison? Certainly there must have been a large number of deer in the area." She said, "We never saw a deer in the three years that they were there," so I think if you take that statement representing the early nineteen hundreds and you look at the wildlife numbers available today you would have to agree that the present plan is very conducive to wildlife management. It seems to be working quite well.

One other point I think that's been made and maybe it's belabored a little but I think that enhancing the grazing, the livestock grazing, incumbent on doing that means enhancing the water availability. Cattle don't go very far without water. By the way, neither do elk or deer or antelope, and I think that if we are going to enhance the grazing that is going to enhance the wildlife, because it does make more water available. There is a fringe area around the lake itself, but that area may be a few hundred yards deep or maybe a mile deep, but that refuge covers a lot more property than that. Therefore, I think that wildlife management would be enhanced by enhancing the grazing aspect particularly in regard to water.

I have been informed that sometime in the past, fifteen, twenty years ago, that there was a significant cut in

grazing already, that the AUM's were reduced somewhere in the neighborhood of thirty to forty percent primarily to accomplish enhancing for the wildlife habitat, and I guess my feeling is if we have already had that kind of a cut on what basis do we stand it again?

I would--I do favor the present plan of management because it does recognize recreational users; recreational uses are very near and dear to me. This last Sunday at--my cabin is at the Pines. The Pines Cabin Owners Association had a meeting. The main topic of discussion was this Draft Environmental Impact Statement, and the resolution was adopted and passed unanimously that we, the cabin owners of the Pines association, all endorse Option A, not no action but no change in management.

Thank you.

(A recess was then taken.)

HEARING OFFICER THOMAS: The next speaker is Steven Page. On deck is David Gregory. Begin when you are ready, Steve.

MR. PAGE: Mr. Hearings Officer, my name is Steve Page, and I ranch in Valley County and manage livestock that ranges on the Charles Russell Game Range.

Most of the things that I would have to say would be repetitious of some of the comments that have already been made, and it is difficult to follow two attorneys, but I do want to go on record as supporting Alternative A or D, the no change or the multiple use alternatives, and I do have a couple of comments to make in regards to the DEIS, assuming that they are appropriate to make at this time.

Mr. Fries indicated in his opening statement that there was some confusion in regards to range condition versus wildlife habitat, in the letters and comments that were made in regard to the DEIS. I have always been of the opinion that excellent range condition and excellent wildlife habitat were synonymous, and I have spoken to several range conservationists and wildlife biologists, and that seems to be their feeling, and I am really not sure what the differential would be between excellent range condition and excellent wildlife habitat.

Another point that I would like to make is that I recently made a tour of our allotment with a regional SCS range conservationist, and upon his survey of the Charles Russell Game Range in the area of--of Harper Ridge and Timber Creek, which we operate on, he indicated that--that he felt that the range was in stagnant and deteriorating condition as the result of lack of grazing, and he said that--as a matter of fact, he pointed out some very good species of grasses or desirable species of grasses to me that were actually dying as the result of not being grazed, and I think that--I think that we all know, any of us who manage range lands, that well-

managed grazing is a requirement for good grass management, and I feel that the cut in grazing on the Charles M. Russell would be a mistake, because I think that it has been shown in past experiences of various government agencies in the management of wildernesses and game ranges that with the lack of livestock grazing the wildlife habitat has actually deteriorated, and I think that this is of great concern right now in some of the wilderness areas.

I understand that some of the wilderness areas in Montana right now are in tough condition and the wildlife are suffering and--and this is the result of no livestock grazing.

I would have no further comments at this time, but if it is appropriate I--I would pose the question to the Fish and Wildlife Service what is the difference between wildlife habitat and range condition? 4

Thank you.

HEARING OFFICER THOMAS: Thank you.

After David Gregory is Kim Enkerud.

DR. GREGORY: I am David Gregory, a practicing physician here in Glasgow. I am sure that the majority of people here have some connection with farming and ranching. I am sure most of them that know me are well aware that I know very little about their business. As a matter of fact, several of them have offered to sell me their outfits and rent them for a year and see how I could do it, but we all have our

special knowledge in special fields.

I happen to own a cabin or I have leased a cabin site. I bought it already built and worked some more on it, and it's active and used quite often. We are back and forth. I go in sometimes late in the evening just at dusk. I come out sometimes very early in the morning, and the wildlife is everywhere. As a matter of fact, I am a little worried there are too many deer that are too tame around our cars. I think we are going to have to stop and throw rocks at them and frighten them.

The sage hens are a traffic nuisance. My wife always wants me to hit one because this time of year they taste better. They--she has a little bit of a soul there.

We are also seeing Marge Hanson's bluebirds there quite frequently almost every trip out, elk and bull elk. You name it. I don't know any other place in Eastern Montana in the whole area. I mean somebody may have something hidden away, but I don't know any other place for people than certain parts of this reservoir. Maybe you know it.

Part of my job outside of doing a passable job of passing out Aspirin and penicillin is to try to get other doctors to move to Northeastern Montana. The one thing we are always talking about is the recreational use of Fort Peck. We don't talk about the Fort Peck locked up for long-term boats and long, big sailboats, and so on, or people that want to

backpack five miles in. We don't talk about that. We are talking about the use of the lake for their wives and their children and their mothers and their grandmothers. We only occupy a little bit of it, over on Hell Creek, and down on Rock Creek, and the Fort Peck site, and the Pines and the Pines Youth Camp, and I think it's been very well managed by the Corps of Engineers.

They are not as nice as you all said. They are kind of tough with us. They make us tow the line. They inspect our sites and we are scared to death of them, but they really do a good job of managing what we have.

I think all of us have seen the actions, well, the Corps of Engineers again wanting to build a series of dams all the way up to Three Forks. We would have it all mud flats. Fortunately, with Senator Metcalf's bill as amended, not his original bill but as amended, we stopped that, but there was always coming back to Congress for more and more money for more working for dams. Nothing could stop the planners in Omaha.

Now, what can we do? We don't have much money. Various organizations rented. They don't have any money. They don't have the millions and millions of dollars that Sierra Club and Friends of the Earth and all these people have. These people--this is big business, but what can we do with our meager resources to protect some of our recreational areas which I know about, to protect our wildlife which I know about? I no longer hunt it. I take pictures.

Our economic base--and I farm these pe[illegible] I don't farm their farms. I farm them, and if they do[illegible]ave it I don't have it.

I am trying to get more doctors in here. We still need two more. What do I tell them? What do I tell them about our future recreation? Well, you can go out there in the powerhouse and you can stand on the dam and look at it and if you got a big boat you can go out on the lake, you can leave the marina and then go as far as you want to, but you got to come back.

I happen to have a boat with a long-range tank. I put a whole--another long-range tank. I have the fancy marine radio in it now. I can do this trip. How many people you know of have got a boat like that? See? I can do this trip. How many other people can do it? Not very many. So this is going to be a province of the rich or the crazy fools who want to walk the sixty-five-pound pack on their back or paddle a canoe, and that's all this is going to be for.

I think there has to be some revamping. There has to be some way the people can shut off the government. I mean the government should never be our enemy.

Now we have a meeting in Glasgow. You are getting overwhelmingly one side. You meet in Lewistown. You will get

eighty percent one side. You get Missoula. You will get ninety-five percent the other way, and I would like an announcement made to the people of Missoula to come out and save Fort Peck. Let them come out and spend a week or two. Let them go to Hell Creek. Let them go to Rock Creek. Let them come up to Fort Peck. Let them go to the Pines. Let them see what's happening. Let them go out and see what some of these fellows are up against in handling their ranches.

Their needs are lock it up for the future to take care of our wilderness, and they don't have the foggiest idea what they are talking about. Somebody's going to clear-cut the crazy mountains here from California pouring in. Save our woods. We all know the mature forests are dead. The only place the bears and the elk and the deer go is where there has been a burn or a cut. That gives them a food supply. The rest of the time they are dead.

I mean multiple use and restoring things to their pristine behavior I think means they include people in the formula somehow. I don't think people should just be written off. Some of the ideas proposed in that thing, certain paragraphs, are ludicrous in that proposal. Besides, folks, we did all this four years ago. Are we going to have to do it again?

HEARING OFFICER THOMAS: Next is Kim Enkerud.

MS. ENKERUD: My name is Kim Enkerud, and I am speak-

ing on behalf of the Badland Cooperative State Grazing District. We would like to go on record as being opposed to Alternative B as stated in the Draft Environmental Impact Statement of the Charles M. Russell Game Range.

We feel an average cut of thirty-three percent in regard to livestock AUM's is unnecessary. Wildlife and livestock have been cohabitating on this described area for many years without harm to either class. In fact, wildlife numbers have increased. There could be a possibility that the numbers of the primary species called for in Executive Order 7509 are already present along with secondary species that are supposedly needed to make up this game range.

The economic impact that will be felt by this AUM cut will drastically hurt the communities where monies received from livestock sales are used.

Beside livestock numbers, recreation uses will be changed. If wildlife numbers are to be increased, hunting will probably be somewhat reduced to help gain this increase. This in turn will cause less recreation dollars to be spent in the communities.

Mainly, however, the rancher himself will be hurt the greatest. Gone will be a portion of his much-needed income which supports himself, his family and his livelihood. Many could be put out of business.

We would recommend a multiple use approach to solving

this so-called conflict between wildlife and livestock. Multiple use benefits all parties involved, hurting none, helping all. The DEIS even shows positive efforts on all areas connected with using the CMR when multiple use is considered.

Therefore, we again would like to state our opposition to Alternative B and our support for Alternative A or Alternative D.

Also I have a list here of fifty-nine people that stated we, the undersigned, are against the proposed Alternative B, found on Pages 9 through 17, in the Draft Environmental Impact Statement, dated February 23, 1984, of the Charles M. Russell Game Refuge--Range. Instead we support the no action, A, alternative on Pages 7 and 8. If Alternative A is not adopted, we recommend adopting the multiple use alternative, D, on Pages 21 and 22. We also are against Alternatives C and E.

Thank you.

HEARING OFFICER THOMAS: The next group of individuals may or may not speak, and I will just call them one by one. First Barbara Hansen.

MS. HANSEN: No, it's all been said.

HEARING OFFICER THOMAS: The next individual is Rocky--I am sorry--Zimdars.

MR. ZIMDARS: Everything's been said that I wanted to.

HEARING OFFICER THOMAS: All right. Steve Schindler.

VOICE: He is gone.

HEARING OFFICER THOMAS: All right. He is gone, I guess. Andy is it Hucks or Hicks?

VOICE: Hicks. He is gone already.

HEARING OFFICER THOMAS: Lawrence Edwards.

MR. EDWARDS: Yes, I am here.

HEARING OFFICER THOMAS: You wish to speak?

MR. EDWARDS: No, I am going to send a letter in.

HEARING OFFICER THOMAS: Pardon?

MR. EDWARDS: I am going to send a letter in.

HEARING OFFICER THOMAS: Thank you.

Jerry McPherson.

MR. McPHERSON: No, I think all of it's been covered.

HEARING OFFICER THOMAS: All right. Thank you.

John McKerlick.

MR. McKERLICK: No, I am going to send a letter, too.

HEARING OFFICER THOMAS: Thank you, John.

R. G. Wiltfong.

MR. WILTFONG: Just a few comments, if I may, right from here. I am a Glasgow businessman, past chairman of the Glasgow Chamber of Commerce and Agriculture. I can't speak for my fellow members of that organization, but as a businessman I would like to express briefly the overwhelming feeling

toward the CMR, and that, of course, is supported by the overwhelming presentation that these people who live in this area have made this evening.

The one thing that I am concerned about that perhaps hasn't been addressed is the introduction or as stated reintroduction of endangered species. In the Endangered Species Act or criteria, treatment, it's my understanding that perhaps black-footed ferret would be introduced into a prairie dog facility, town or community, as you say, that has grown quite large, and that black-footed ferret probably would be traveling on private property. Since that is an endangered species is that not conceivable that in the name of endangered species condemnation can perhaps ensue or what can happen to that private land owner where there is no control or, say, what the Fish and Wildlife Service is doing in that respect? I understand that with falcon we are going to be excluded from that. Why, I wouldn't want them near my bedroom, but you understand my point? That's one thing I would like to say.

HEARING OFFICER THOMAS: Thank you.

These fellows haven't given me permission to say this, but I think I am going to offer it. In any event, if you have a question like that or Steve Page had a good question you might want to stay after and discuss it with some of the Fish and Wildlife experts, and I am sure if they can't

answer you here that they will certainly give their best effort to try to get you an answer.

The next person is Leonard Svenson or is it Swenson? I am sorry. Swenson. Is he here? All right. He is gone.

And the last is H. W. Hammond.

MR. HAMMOND: I am appearing not because I want to get to this mike but standing back there you may not hear me.

Hearing Officer and ladies and gentlemen, I think in hearing this testimony that's been given here tonight almost everything has been covered. I have one question that was brought up at a meeting in Malta one time, and there has been a great deal said about endangered species being protected in this area. Would that endangered species also include the wolf? I know I am not going to get an answer tonight, but that 5 could be pretty devastating, and it was suggested in Malta that the wolf now has become a little more prominent in Northern Minnesota, and they were going to plant them in some other places. I hope that isn't a consideration in this area.

I certainly support everything that has been said here tonight to keep things as they are at this time, and it's always been kind of a mystery to me why we are as ranchers forced out of some areas that the government controls. Yet we must share with all wildlife because there are no areas in which they have to stay, so we share with the Fish and Wildlife in their efforts constantly, and so I think it only behooves

them to give the farmer and rancher a little more consideration when it comes to the areas that they control.

Now, I have one other thing that bothers me, and that is in the legislature it was brought up that these hearings were going to be held in the areas where there was the greatest number of people. We opposed that. We said that these problems--the hearings should be held where the problem exists, not where there is the greatest number of people, and, of course, now we are exposed to the situation where we have the hearing here tonight, and, as the good doctor pointed out, you are hearing the side of the people who live here and have to endure what goes on here. It will probably be that way in Lewistown, because those people know a great deal about it, and in Missoula it will probably be very much different.

It seems to me that if you are going to give testimony in Missoula you should have to swear an affidavit of some kind that you have been here or you had used it or you knew something about it, because without that I don't think the testimony means very much, and as far as endangered species is concerned I believe that if things go on as they sometimes seem to be going on really the only endangered species is going to be the farmer and rancher.

Thank you.

HEARING OFFICER THOMAS: I believe Ken Noland might have a word.

MR. NOLAND: Thank you, Counsellor, Fish and Game. This is going to be short. The Congressman is still in session and he couldn't be here.

Speaking of the endangered species, I felt like one tonight when I came in. Where is Kim? Did she leap on me! She said, "Are you for us or against us, and if you sign this you are signing for it," and I could lose my job, Kim. The--I don't know a lot about the black-footed ferret and the prairie dogs, but I am sure that there is a lot of merit in what you are saying.

Maybe I could relate a story about the grizzly bear, because down in Yellowstone Park they sent some of your aides down there to see how those bears got out there, and I really didn't care how they got out there, and they said we would sleep in the cabin, and there was a lot of food down there, and we were having hearings, and I think that all of us here in this area have a great love for wildlife. The only one that perhaps didn't left, and Mr. Pauley--I will ask him on the phone tomorrow, but they were asking what would happen if the grizzly bear became extinct, and there were a lot of ranchers who were having a lot of problems with their livestock, and they were a little bit hot, and I think that we have to keep the grizzly bear, but they insisted. They said, "What would happen if the grizzly bear became extinct?" One rancher finally thought and thought, and he said, "I guess we would be

up to our butts in huckleberries." Well, it does create problems, and from Congressman Marlenee and the reason I am here is to see that if these are working, if these hearings are working, and I understand that there has been a greater number of people to hearings here before, but I don't think the attitudes have changed, and we play little games.

Sly Jamison (sp.)-- I will be in Lewistown tomorrow night, and we will hear about the same thing, so I will be in Missoula, but on behalf of the Congressman we certainly want to thank these gentlemen for being here, for making themselves available to you people. This is how it's supposed to work. I think this is how it will work.

Thank you.

HEARING OFFICER THOMAS: That's all the people who indicated on the cards that they wished to speak. Is there anyone else? Would you come forward and identify yourself, please?

MR. CORNWALL: Good evening. My name is Len Cornwall and I represent the Cornwall Ranch in Valley County and also the Muddy Creek Cooperative State Grazing District, which is also located in Valley County.

I feel that Alternative A and/or the other alternative that encourages multiple use should be adopted on the CMR. If an area this large is locked up, all other areas of Eastern Montana and particularly Valley County, because it

lies next to the populated community of Glasgow, will be directly affected. Because of the actions of various government agencies, and I am referring to access routes being blockaded, private landowners being harassed as to developments on the CMR, these--these actions in turn discourage the public's use and appreciation of this region.

My uncle, Eddie Boe, was an early game warden here. Possibly some of the older people here remember him, but he was an employee of the Montana Fish and Game Department that helped encourage and transported elk into this region. These animals were brought in for the sole purpose of improving the hunting for the local citizens and not to become play things for every do-gooding public servant from the eastern part of the United States.

I would like to ask the elk how much management they can stand from all these interlocking agencies and bureaucrats. If grazing of domestic livestock is reduced this range will deteriorate and the elk will leave. We as ranchers in Northern Valley County will end up struggling under a greater tax burden because of the reduction in domestic livestock within the county and we will have more hunter and people impact on deeded land because the public is denied access to 1.1 million acres in Northern Montana.

Therefore, I oppose Alternative B of the DEIS and encourage adoption of Alternative A, no action.

Thank you.

HEARING OFFICER THOMAS: Thank you.

Are there anyone--anyone else who wishes to be heard at this time?

MR. HUSTON: I would like to get up there and ask the Fish and Wildlife people one question while all these people are here. Could I do that?

HEARING OFFICER THOMAS: As I indicated in my initial remarks, you will certainly be allowed to ask a question and you can stay after if you want to speak with the experts in order to get an answer.

MR. HUSTON: I don't hear very good. Did he say I can get--

HEARING OFFICER THOMAS: You can certainly ask a question. Would you please give your name again, sir, for the record?

MR. HUSTON: Would I what?

HEARING OFFICER THOMAS: Would you give your name?

MR. HUSTON: Dave Huston is the one I use most of the time.

We are talking about government land when we are talking about CMR, right, and my question is at no time in history has there ever been a public meeting in Glasgow or Lewistown about a public-land issue at Missoula, Montana. My question is why in the hell is there being a meeting held in

Missoula, Montana, about our--what we have got to put up with here on the CMR when it is none of their business? The reason we have never had a meeting here over something at Missoula is because them people didn't think it's any of our business, their business, where we are sticking our nose in their business. I would like to know why there is a meeting, even though it's government land, in Missoula when there has never been one in Eastern Montana over a public or government land, whichever you want to call it, issue up next to Missoula.

Now, if I can get an answer to that I would be--

HEARING OFFICER THOMAS: I think that's a very legitimate question, and if you want to stay after I am sure they will be happy to try to answer it.

MR. HUSTON: Why don't we all hear the answer to it?

HEARING OFFICER THOMAS: Well, let me explain, in--in my limited knowledge, that under the Constitution of the United States the Congress has been given certain legislative power, as you attorneys know and I am sure as all the rest of you folks are all familiar with. They continue to pass laws and, as I understand it, they have passed certain laws that affect national wildlife refuges and when they do something that's national in scope I assume that that means it has an impact broader than the locality in which that land is situated.

Now, in other words, you may feel and I think it's--

it's right for you to state your opinion that those people in other parts of the country shouldn't have a voice in the land in this area. Congress has spoken, I guess, in a national way, and that's what--that's the mandate that the Fish and Wildlife Service is trying to deal with. They have to allow all people affected by a national refuge who want to make a comment to do so.

That's my limited personal understanding of it.

Yes, Doctor.

DR. GREGORY: Would it be changing the ground rules or unfair to ask the Missoula audience to identify whether they have ever been to Fort Peck or ever seen it or know anything about it?

HEARING OFFICER THOMAS: I can think of one way that that question could be submitted to some of the people in Missoula, and that would be for one of you or your representatives to go there and ask them that and allow them of their own free will to answer it as they see fit.

Any other questions?

MR. HAMMOND: Yes. Is there any--

HEARING OFFICER THOMAS: May I interrupt? Would you identify yourself to the court reporter again?

MR. HAMMOND: Senator H. W. Hammond.

Is there any reason why the people from Missoula couldn't be here tonight?

HEARING OFFICER THOMAS: You will have to ask them. I haven't asked them.

MR. HAMMOND: See, they are not being denied anyplace to come here tonight. Were they notified there was a meeting here?

HEARING OFFICER THOMAS: Yes, it was in the Federal Register.

MR. HAMMOND: If they were very concerned it would seem to me they would have come.

HEARING OFFICER THOMAS: Thank you. Any other questions?

I thank you all for coming and attending. I think you have very excellently presented your views and I am sure they will duly considered.

If no one else has anything to say or make any other statements I will declare this hearing adjourned. Thank you again.

(The hearing was then concluded at the hour of 9:30 p.m., this 31st day of July, 1984.)

CERTIFICATE

I, Harry G. Rauch, a Certified Shorthand Reporter and Registered Professional Reporter, do hereby certify that I took down in stenotype the proceedings had on the subject hearing at the time and place hereinbefore set forth and that the foregoing seventy-one (71) pages constitute a full transcript of my stenotype notes of said proceedings.

Dated this 21st day of August, 1984.

Harry G. Rauch
Certified Shorthand Reporter
and
Registered Professional Reporter

This Submitted
By Wayne J. Putz Jr
Glasgow Mont. July 27-1984 ③

This E.I.S. Is Just
a Re Fried Product of the
First E.I.S. Which Was
Produced By a Coyote Hunter
From Utah

The management of The C.M.R
Should be left as it is Today
Its working Well and There
is no Need for any
Reduction in livestock
Grazing

The Economic Projections
Are as Fictitious as The
Whole E.I.S. Not only would
The Reduction of Grazing Put
Many Ranchers out of Business
But would make many more
Border line operators
Wether they Could Continue
to Operate

It Does Not take in
to Consideration The terrific
Amount of Damage Done to
Ranchers Crops and Hay Meadows
on Private land

The Elk Herd Is a
Planted Herd Established
with cooperation Of Ranchers
Which Was a Damn Big
Mistake on our Part,

You Dont Have Wild
life as Such any more
The are spending more
of Their Time on Winter
Wheat Fields, Hay meadows
and Domestic Crops on
Private land and Drinking
from our Water tanks
and in Winter when The
Snow is Deep They are in
our Feed lots and on top of
Hay stacks Ranchers are
About Fed up with this
Kind of onesided Abuse

How any Department
Can Request a Cut in
Grazing and Then Have The
Gots to Perpetuate a
Prarie Dog town of 10,000
to 20,000 Acres of The Most
Destructive animal on the
Face of The Earth, Not only Do
They Eat Every spear of
Vegation Roots and all but
They Bring up Thousands of
tons of Dormant Earth
That lays Dormant for

Years, If you dont
Think So go out and look
At old dog town where
The Dogs Were Eradicated
50 years ago and They
are still Dormant.

After You have Put
Ranchers Out of Business
and Deprived all of
Eastern Mont of Only
Recreation area and Cabin
Sites along Fort Peck lake
and When The Snow is
Deep and The only Salvation
for Wild life is Ranchers
Feed Lots and Hay stack
and Thousands of animals
That Cant get there Die
of starvation STAND in
Front of your Mirror and
Beat your Chest and tell
Yourself What a Wonderful
Game manager You are
If a Rancher Treated his livestock
With such Disregard He would
Be Doing time in The Slammer
for Cruelty to animals

My name is Walt Collins and I am speaking on behalf of the Fort Peck Game Range Committee as their President.

The Fort Peck Game Range Committee is made up of all permittees who graze livestock on the Charles M Russell Game Range.

We would like to present the following testimony in regards to the Draft Environmental Impact Statement on the Charles M Russell Game Range.

The proposed alternative in the DEIS would like to cut livestock grazing an average of 33%. Cuts vary from none to 100% cut. Reducing the income of a rancher 1/3 is bound to have a tremendous negative effect not only on him, but on where and on whom he spends his dollars. True, the direct effect will all be sustained by the ranchers, but indirectly involved are businessmen, livestock sales yards, bankers, and the tax base will be decreased due to lack of livestock numbers. In a depressed economy, less money available to be spent in mainly agricultural communities will not help anyone.

Presently, livestock and wildlife are cohabitating well together. Numbers have increased in the wildlife catagory. A good example of this is the increase in the elk herd.

These animals can live together in harmony. In fact, by removing livestock or even wildlife from the range will harm, not enhance the forage available. There is a common known fact that grass will not grow if not grazed. There are areas in some allotments where neither wildlife or livestock have been, where the forage growth is stagnant. When compared to where livestock and wildlife have been, the forage available is better where these animals have grazed and reseeded the plants by the so called trampling effect. This example advocates multiple use management.

How do the Fish and Wildlife know that the criteria set forth in Executive Order 7509, which established the Fort Peck Game Range, are not already being met. Have the Fish and Wildlife counted the antelope, grouse, and non-predatory species to determine their numbers. Maybe this whole DEIS is unnecessary because there are 400,000 sharp-tailed grouse, 1500 antelope and such non-predatory secondary species to have a balanced wildlife population. It could also occur that the Fish and Wildlife are increasing the burden of the range due to a combined wildlife population that is using range dedicated to the primary species. Do you actually know the wildlife numbers and have you evaluated the effects of wildlife on the range available for domestic livestock as provided for in Executive Order 7509.

These are some reasons we encourage management of the CMR to remain as present. If management does have to change, we request it to be the multiple use alternative.

Improvements as stated in the multiple use alternative would provide enhanced forage which would increase aums for both wildlife and livestock. Therefore increasing your wildlife numbers which you think is necessary.

Cooperation between permittees and the federal agencies involved would also be enhanced as we (the ranchers) are not losing our much needed income and would not feel threatened.

Recreationists, hunters, cabin owners, etc. would still have the capability to use this beautiful land due to the multiple use concept.

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page 2

The Fort Peck Game Range Committee would like to sit down with the Fish and Wildlife Service and come to an agreement that helps both sides. If this is not possible, we believe that the alternative that should be adopted is the no action alternative, but we would advocate adopting multiple use concepts.

Walt Collins

Charles G. Barnard
Regina Route
Malta, Montana 59538

Reference: Charles M. Russell National Wildlife Refuge
1984 Draft Environmental Impact Statement

Any future plans can only be assessed by the history of the past of the portion of the Charles M. Russell National Wildlife Refuge that I have been familiar with for over half a century.

Gus Hormay, noted range conservationist, stated that the range suffered severe damage by the vast herds of the cattle barons after the killing of the buffalo. It was too many cattle and too few water holes.

Next came the homesteaders with the stipulated requirement of breaking up the prairie sod to prove up their homestead. Within a few years many homesteaders left broken in dreams and pocketbook. Rather than dispose of their faithful horses they turned them loose. Horses, rabbits and prairie dogs multiply rapidly.

The late 1920's saw the elimination of the horse herds.

The early 1930's, in spite of drought and depression, played a major role in the range renovation. The vast prairie dog towns were eliminated, the WPA constructed many reservoirs. Next was the systematic grazing and establishment of allotments by the Taylor Grazing Act. Fort Peck Dam was built. Fort Peck Game Range was created by Presidential Order for 400,000 sharptailed grouse and 1500 antelope and the stipulation that livestock grazing shall continue.

Under joint administration by the BLM and the FWS the Fort Peck Game Range, later renamed the Charles M. Russell National Wildlife Refuge, the FWS was very reluctant to grant permission to construct reservoirs or fences to distribute livestock grazing. Thus the range on the CMR did not improve as rapidly as the adjacent BLM administered range. The CMR range was further depleted and destroyed by unrestricted growth of prairie dog towns.

In the Missouri Breaks 50 years ago you considered yourself luck to see a deer track in a day and a miracle if you saw a deer. There were few antelope. Now deer are plentiful. Elk have been added through a joint venture of local ranchers, sportsmen groups and the Montana Department of Fish, Wildlife and Parks. Antelope have not recovered from the December 14, 1964 storm and the elimination of the use of 1080 and the consequential increase in coyote numbers.

With observations of over half a century lets appraise the Draft Environmental Statement.

Beginning with the Presidential Order of 1936 that created Fort Peck Game Range, where are the numbers of Sharptails on the range? Habitat is shown. Given is just how much ranchers would lose under each alternative. I would lose 25% of my income, not 6%, under Alternative E, No Grazing. Losses would be correspondingly less for the other alternatives.

Where is the count of antelope numbers to show that the Presidential Order is being carried out?

If grazing is reduced or eliminated or under mitigating circumstances in Alternatives B, C and D where is the compliance with the Executive Order that grazing shall continue. Alternative E, No Grazing, shows only contempt for the President of the United States.

The Court Decisions of Judge James Batton's Court in Billings, Montana and the Ninth Circuit Court of Appeals of Portland, Oregon are mentioned in the prelude but I can find no place where any of the Judges decisions were implemented in any alternative or even mentioned. This seems to be ignoring the decisions of the Judicial Branch of our Government.

Many of the grazing rules are a product of the publication and thereby becoming the same as law by the publication in the Federal Register. This bypasses Congress

In attempting to eliminate the grazing of domestic livestock by abnormally high grazing fees on inferior range, restriction of numbers and the reduction of grazing rights when a ranch is sold, one very important aspect of life upon this planet is being overlooked. Grass and forbs are the world's greatest renewable resource. They can only be harvested economically on such terrain as the CMR by the ruminant. They thus contribute to the world's supply of the rich renewable source of protein. If game animals were to harvest this resource exclusively under our present game laws, how much of this harvest would reach the masses?

Under Alternative A, Proposed Action, with its 33% reduction in grazing, are the AUM's already removed by the UL Bend Wilderness and the over 10sections of the de facto Brown Point wilderness where no grazing has taken place in over 20 years considered?

For the people of this nation there can only be one alternative for administration of the Charles M. Russell National Wildlife Refuge. That is the multiple use concept, multiple use management. It is the best and fairest for mankind and wildlife.

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⑤

I am Sever Enkerud and I am speaking for the Wittmayer Grazing Association as their President. The Wittmayer Grazing Association is made up of 25 individual ranchers. We are located in Valley County.

We are to receive a 13% cut in aums on range considered 83% good and 17% excellent. In a community based on agriculture, any decrease in cattle numbers equals a decrease in dollars spent in the community. This results in a decrease of income received by businesses which is used to hire employees, donate to worthy organizations, and in general to survive. Also, the tax base of the entire county is decreased. This loss of income must be made up somewhere and it probably will be in higher taxes for the entire county. This cut will not only hurt the ranchers directly, but the entire county population indirectly. The ranchers involved need all the income they can produce to pay their many bills. A reduction in one herd could possibly cause him to go out of business.

I would like to point out some areas where the Wittmayer Grazing Association has enhanced both the private and public lands, creating better habitat for both wildlife and livestock, all without a reduction in either livestock or wildlife numbers. In fact, these improvements have increased the elk, grouse, antelope, and other wildlife numbers. Our cattle numbers by the way, have not been increased by us due to these improvements, just wildlife.

We have developed wells, dams, and springs amounting to an approximate total cost of $150,000.00. This cost has been directly paid for by the association members. These improvements have created better distribution of both cattle and livestock. A rest rotation system was established that enhances livestock and wildlife habitat and number distribution. Range conditions are quite good, even in this drought. We have also seeded 2400 acres of cropland, that would be producing wheat and barley,back to grass. This is due to the wildlife not staying out of these grainfields.

We are using a multiple use concept that not only benefits animals, but gives people the opportunity to use these public and private lands. People are allowed to hunt on our private lands. Recreationists are allowed to use our private roads to get to public lands. Anyone and everyone is welcome on our association and these people have treated us well. I don't think this cooperative attitude will be in evidence if the proposed alternative is adopted in this Draft Environmental Impact Statement. Multiple use works well when all parties recognize the need for all aspects of humanity to work together, not to support only one side.

I would like to add that the WittmayerGrazing Association is Farmer Home Administration financed. We believe it is detrimental for one government agency to work against another. The association has always made their annual payment on time and in the full amount. If our numbers are cut, we might not be able to do so.

The Wittmayer Grazing Association would like to work with the Fish and Wildlife to come up with a solution that will benefit all parties involved. That is why we would recommend adopting the multiple use alternative, which does benefit all parties involved, instead of the preferred alternative.

Sever Enkerud
Tampico Rt
Glasgow, Mont 59230

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⑥

My name is Barry Billingsley. I am speaking on behalf of the Silver Dollar Grazing Association. It is made up of 17 individual family size ranches. We run on the Charles M Russell Game Range 20 miles south of Glasgow on the west shore line of Fort Peck Lake.

The Fish and Wildlife is proposing to cut our aums 47% on range that is considered 100% good. This cut of grazing rights will be devastating to the ranchers involved. The local agricultural suppliers will suffer immediately. The multiplier effect on this agricultural community will be in the hundreds of thousands.

The Silver Dollar Grazing Association presently is running under a rest rotation system. This creates a better utilization of the range. The cattle are better distributed, there is less interference with wildlife, and there is better use of forage by the wildlife and livestock.

The members of the Grazing Association are firm believers in the multiple use concept. We feel this alternative would best serve the needs of the Fish and Wildlife, the Grazing Association, recreationists, hunters, and other members of the public who use the Charles M Russell Game Range. Multiple use benefits not only people, but wildlife andlivestock. Due to this reason, we would request that if the no action alternative is not adopted, the multiple use alternative be considered and used.

Again, I would ask the proposed alternative in the Draft Environmental Impact Statement be dropped and either the no action alternative or the multiple use alternative be adopted. If the no action or multiple use alternative is chosen, the Silver Dollar Grazing Association would be glad to cooperate with the Fish and Wildlife and other government agencies involved to devise a workable plan that all parties can live with.

Barry Billingsley
Box 847
Glasgow, Montana
59230

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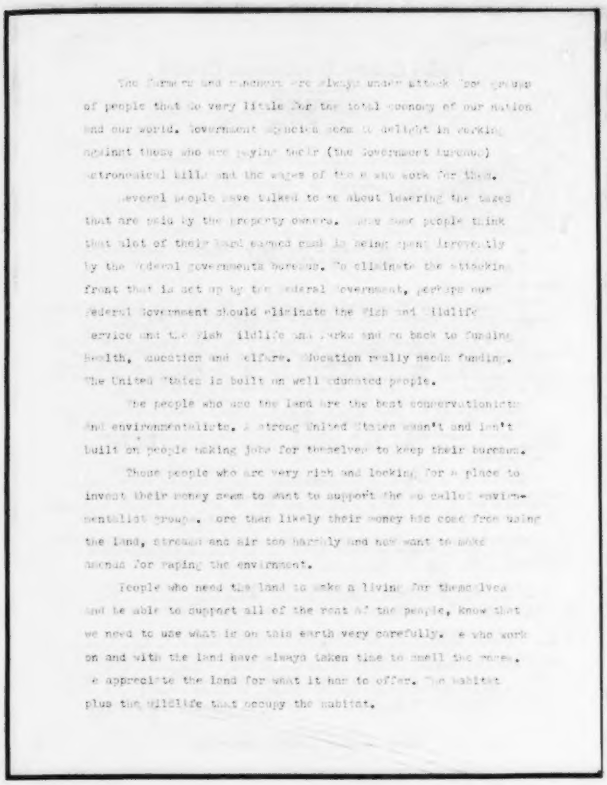
⑦

Good evening, I am Marlyn Grahood from Malta, Montana. My husband, Wesley and I want the Charles M. Russell National Wildlife Refuge left just as it is now. We want it left just as it is because there are absolutely no guarantees of what we would get if the management of the refuge was changed. We ranch south of Malta in Phillips County, but we do have a personal interest in the management of the CMR because we are in the Wittmayer Grazing Association.

There is one group of people in the United States, the farmers and ranchers who feed the world. These people are the poorest paid for their labor and their products. People who work the soil generate what the economy will be world wide. Farmers and ranchers make it necessary to have our food stores, our clothing stores, machinery dealers,newspapers and any other line of business that you are concerned with or can think of that someone makes a living at in this world.

There are other users of the soil or natural resources, such as timbermen, the logging industry, mining, coal, copper or precious metals, the oil industry, our laborers who contribute towards maintaining the national and world wide economy.

The Federal Government through its bureaucracys is working very hard to undermine the well being of the most important industries in the world.



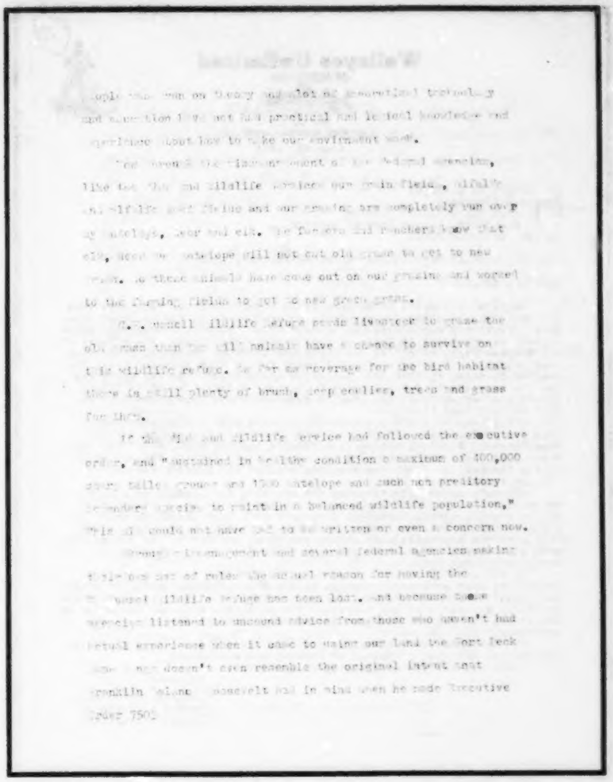
The farmers and ranchers are always under attack from groups of people that do very little for the total economy of our nation and our world. Government agencies seem to delight in working against those who are paying their (the Government bureaus) astronomical bills and the wages of those who work for them.

Several people have talked to me about lowering the taxes that are paid by the property owners. Some some people think that alot of their hard earned cash is being spent irreverently by the federal governments bureaus. To eliminate the attacking front that is set up by the Federal Government, perhaps our Federal Government should eliminate the Fish and Wildlife Service and the Fish Wildlife and Parks and go back to funding Health, Education and Welfare. Education really needs funding. The United States is built on well educated people.

The people who use the land are the best conservationists and environmentalists. A strong United States wasn't and isn't built on people making jobs for themselves to keep their bureaus.

Those people who are very rich and looking for a place to invest their money seem to want to support the so called environmentalist groups. More than likely their money has come from using the land, streams and air too harshly and now want to make amends for raping the environment.

People who need the land to make a living for themselves and be able to support all of the rest of the people, know that we need to use what is on this earth very carefully. We who work on and with the land have always taken time to smell the roses. We appreciate the land for what it has to offer. The habitat plus the wildlife that occupy the habitat.



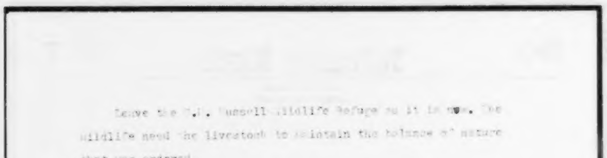
People who run on theory and alot of generalized technology and education have not had practical and logical knowledge and experience about how to make our environment work.

Through the mismanagement of the federal agencies, like the Fish and Wildlife Services our grain fields, alfalfa and alfalfa seed fields and our grazing are completely run over by antelope, deer and elk. We farmers and ranchers know that elk, deer and antelope will not eat old grass to get to new grass. So these animals have come out on our grazing and worked to the farming fields to get to new green grass.

C.M. Russell Wildlife Refuge needs livestock to graze the old grass then the wild animals have a chance to survive on this wildlife refuge. As far as coverage for the bird habitat there is still plenty of brush, deep coulies, trees and grass for them.

If the Fish and Wildlife Service had followed the executive order, and "sustained in healthy condition a maximum of 400,000 sharp tailed grouse and 1500 antelope and such non preditory secondary species to exist in a balanced wildlife population," This EIS would not have had to be written or even a concern now.

Through mismanagement and several federal agencies making their own set of rules the actual reason for having the C.M. Russell Wildlife Refuge has been lost. And because these agencies listened to unsound advice from those who haven't had actual experience when it came to using our land the Fort Peck Game Range doesn't even resemble the original intent that Franklin Delano Roosevelt had in mind when he made Executive Order 7509.



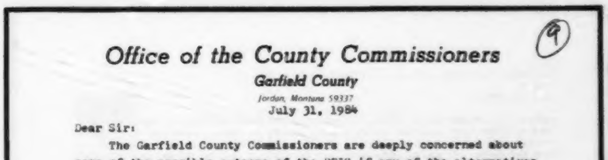
Leave the C.M. Russell Wildlife Refuge as it is now. The wildlife need the livestock to maintain the balance of nature that was ordered.

One more thing, in reference to my letter found on page 336 of the 1984 EIS, when I responded to the 19[illegible] EIS, I disagree with the EIS's response to my letter."Predators are not prohibited, rather they are not mentioned."

It says "such nonpreditory secondary species" Please refer to page 15[illegible], the executive order 7509. Nonpreditory means not a preditor.

Thank you,

Marlyn Crahood
Box 1178
Malta, Mont
59538



⑨

Office of the County Commissioners

Garfield County
Jordan, Montana 59337

July 31, 1984

Dear Sir:

The Garfield County Commissioners are deeply concerned about some of the possible outcome of the DEIS if any of the alternatives listed are implemented except the alternative A. (No action alternative).

We are in a 6th class county with only $6,759,624.00 taxable valuation which is one of the lowest in the state. If the other alternatives were implemented it could further reduce livestock numbers as well as jeopardize greatly the operations and existance of the effected ranchers. This would also put a greater tax burden on the remaining tax payers of Garfield County, to pay for schools, roads, and other services that are needed.

As a rancher myself with a grazing allotment on the CMR, I would also be personally effected. By eliminating or reducing multiple use on the CMR, it would do little or nothing to enhance the wildlife because of the harassment and predation of predators. The ranchers in Garfield County, as well as the Fish & Wildlife Animal Damage Control Agents spend alot of time and money protecting livestock from predators that are raised on the CMR then move onto private property where predator control is being applied. Reducing livestock numbers on the CMR will not improve wildlife habitat when they are not there.

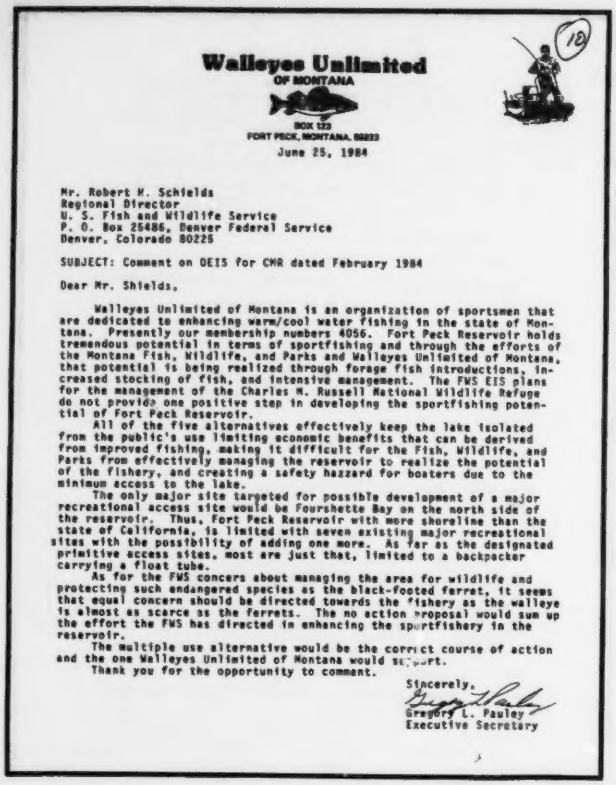
Your full consideration on this matter would be greatly appreciated.

Sincerely,

John E. Trumbo

John E. Trumbo,
Garfield Co. Comm.,
Vice-Chairman

Ted Schmidt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Walleyes Unlimited
OF MONTANA
BOX 123
FORT PECK, MONTANA, 59223

June 25, 1984

Mr. Robert H. Schields
Regional Director
U. S. Fish and Wildlife Service
P. O. Box 25486, Denver Federal Service
Denver, Colorado 80225

SUBJECT: Comment on DEIS for CMR dated February 1984

Dear Mr. Shields,

Walleyes Unlimited of Montana is an organization of sportsmen that are dedicated to enhancing warm/cool water fishing in the state of Montana. Presently our membership numbers 4056. Fort Peck Reservoir holds tremendous potential in terms of sportfishing and through the efforts of the Montana Fish, Wildlife, and Parks and Walleyes Unlimited of Montana, that potential is being realized through forage fish introductions, increased stocking of fish, and intensive management. The FWS EIS plans for the management of the Charles M. Russell National Wildlife Refuge do not provide one positive step in developing the sportfishing potential of Fort Peck Reservoir.

All of the five alternatives effectively keep the lake isolated from the public's use limiting economic benefits that can be derived from improved fishing, making it difficult for the Fish, Wildlife, and Parks from effectively managing the reservoir to realize the potential of the fishery, and creating a safety hazzard for boaters due to the minimum access to the lake.

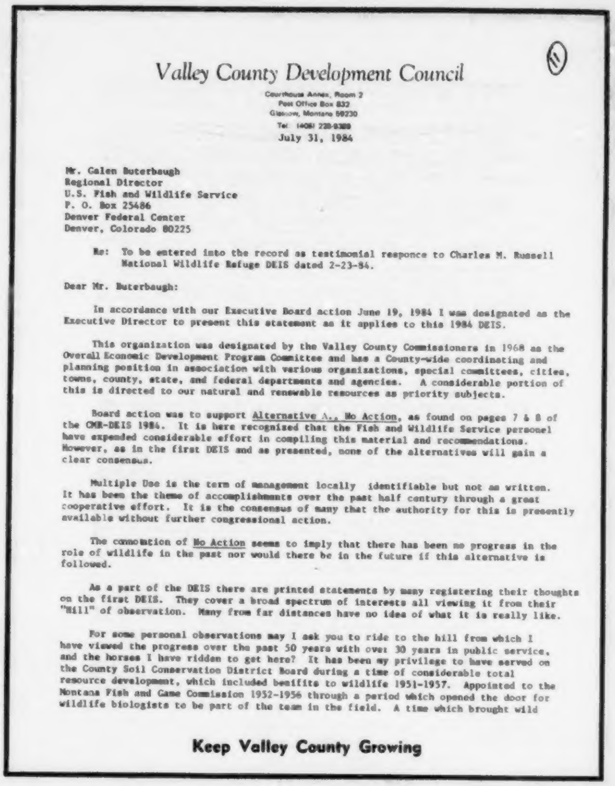
The only major site targeted for possible development of a major recreational access site would be Fourshette Bay on the north side of the reservoir. Thus, Fort Peck Reservoir with more shoreline than the state of California, is limited with seven existing major recreational sites with the possibility of adding one more. As far as the designated primitive access sites, most are just that, limited to a backpacker carrying a float tube.

As for the FWS concers about managing the area for wildlife and protecting such endangered species as the black-footed ferret, it seems that equal concern should be directed towards the fishery as the walleye is almost as scarce as the ferrets. The no action proposal would sum up the effort the FWS has directed in enhancing the sportfishery in the reservoir.

The multiple use alternative would be the correct course of action and the one Walleyes Unlimited of Montana would support.

Thank you for the opportunity to comment.

Sincerely,
Gregory L. Pauley
Gregory L. Pauley
Executive Secretary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Valley County Development Council
Courthouse Annex, Room 2
Post Office Box 832
Glasgow, Montana 59230
Tel. (406) 228-9389

July 31, 1984

Mr. Galen Buterbaugh
Regional Director
U.S. Fish and Wildlife Service
P. O. Box 25486
Denver Federal Center
Denver, Colorado 80225

Re: To be entered into the record as testimonial responce to Charles M. Russell National Wildlife Refuge DEIS dated 2-23-84.

Dear Mr. Buterbaugh:

In accordance with our Executive Board action June 19, 1984 I was designated as the Executive Director to present this statement as it applies to this 1984 DEIS.

This organization was designated by the Valley County Commissioners in 1968 as the Overall Economic Development Program Committee and has a County-wide coordinating and planning position in association with various organizations, special committees, cities, towns, county, state, and federal departments and agencies. A considerable portion of this is directed to our natural and renewable resources as priority subjects.

Board action was to support Alternative A., No Action, as found on pages 7 & 8 of the CMR-DEIS 1984. It is here recognized that the Fish and Wildlife Service personel have expended considerable effort in compiling this material and recommendations. However, as in the first DEIS and as presented, none of the alternatives will gain a clear consensus.

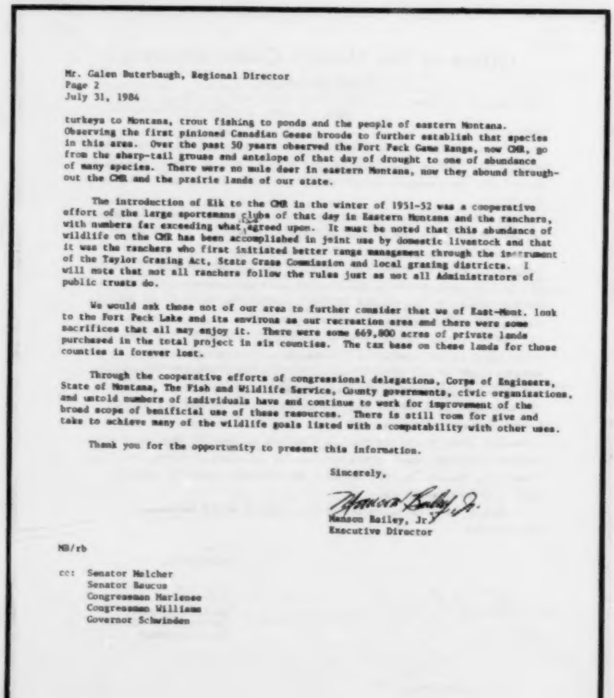
Multiple Use is the term of management locally identifiable but not as written. It has been the theme of accomplishments over the past half century through a great cooperative effort. It is the consensus of many that the authority for this is presently available without further congressional action.

The connotation of No Action seems to imply that there has been no progress in the role of wildlife in the past nor would there be in the future if this alternative is followed.

As a part of the DEIS there are printed statements by many registering their thoughts on the first DEIS. They cover a broad spectrum of interests all viewing it from their "Hill" of observation. Many from far distances have no idea of what it is really like.

For some personal observations may I ask you to ride to the hill from which I have viewed the progress over the past 50 years with over 30 years in public service, and the horses I have ridden to get here? It has been my privilege to have served on the County Soil Conservation District Board during a time of considerable total resource development, which included benifits to wildlife 1951-1957. Appointed to the Montana Fish and Game Commission 1952-1956 through a period which opened the door for wildlife biologists to be part of the team in the field. A time which brought wild

Keep Valley County Growing


Mr. Galen Buterbaugh, Regional Director
Page 2
July 31, 1984

turkeys to Montana, trout fishing to ponds and the people of eastern Montana. Observing the first pinioned Canadian Geese broods to further establish that species in this area. Over the past 50 years observed the Fort Peck Game Range, now CMR, go from the sharp-tail grouse and antelope of that day of drought to one of abundance of many species. There were no mule deer in eastern Montana, now they abound throughout the CMR and the prairie lands of our state.

The introduction of Elk to the CMR in the winter of 1951-52 was a cooperative effort of the large sportsmans clubs of that day in Eastern Montana and the ranchers, with numbers far exceeding what was agreed upon. It must be noted that this abundance of wildlife on the CMR has been accomplished in joint use by domestic livestock and that it was the ranchers who first initiated better range management through the instrument of the Taylor Grazing Act, State Grass Commission and local grazing districts. I will note that not all ranchers follow the rules just as not all Administrators of public trusts do.

We would ask those not of our area to further consider that we of East-Mont. look to the Fort Peck Lake and its environs as our recreation area and there were some sacrifices that all may enjoy it. There were some 669,800 acres of private lands purchased in the total project in six counties. The tax base on these lands for those counties is forever lost.

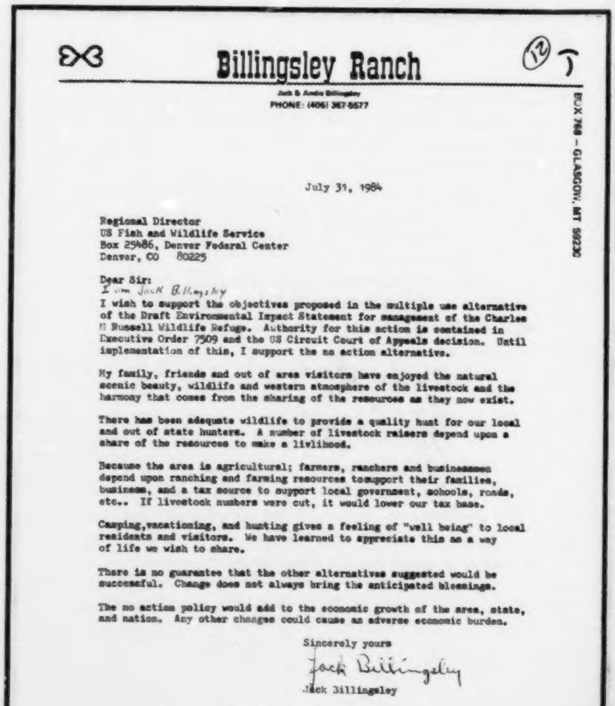
Through the cooperative efforts of congressional delegations, Corps of Engineers, State of Montana, The Fish and Wildlife Service, County governments, civic organizations, and untold numbers of individuals have and continue to work for improvement of the broad scope of benificial use of these resources. There is still room for give and take to achieve many of the wildlife goals listed with a compatability with other uses.

Thank you for the opportunity to present this information.

Sincerely,
Manson Bailey, Jr.
Manson Bailey, Jr.
Executive Director

MB/rb

cc: Senator Melcher
Senator Baucus
Congressman Marlenee
Congressman Williams
Governor Schwinden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Billingsley Ranch
Jack & Andie Billingsley
PHONE: (406) 367-5577
BOX 768 – GLASGOW, MT 59230

July 31, 1984

Regional Director
US Fish and Wildlife Service
Box 25486, Denver Federal Center
Denver, CO 80225

Dear Sir:
I am Jack Billingsley
I wish to support the objectives proposed in the multiple use alternative of the Draft Environmental Impact Statement for management of the Charles M Russell Wildlife Refuge. Authority for this action is contained in Executive Order 7509 and the US Circuit Court of Appeals decision. Until implementation of this, I support the no action alternative.

My family, friends and out of area visitors have enjoyed the natural scenic beauty, wildlife and western atmosphere of the livestock and the harmony that comes from the sharing of the resources as they now exist.

There has been adequate wildlife to provide a quality hunt for our local and out of state hunters. A number of livestock raisers depend upon a share of the resources to make a livlihood.

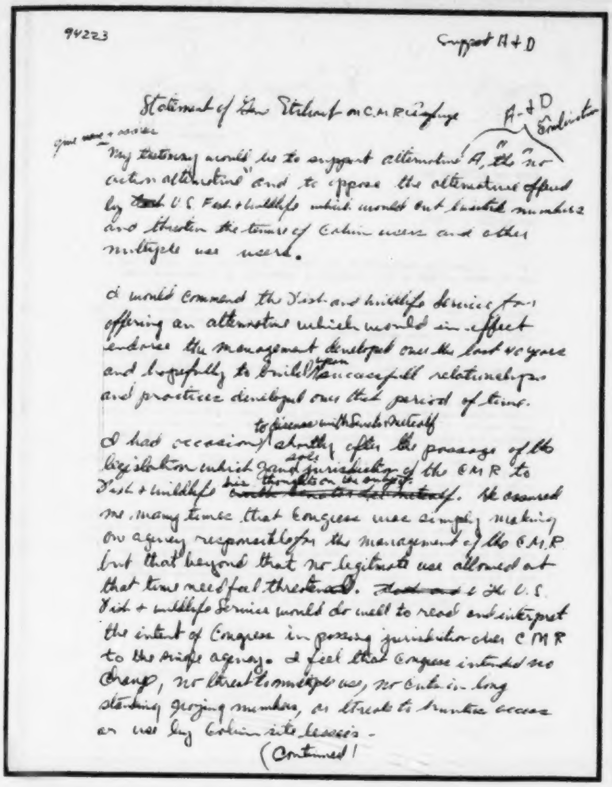
Because the area is agricultural; farmers, ranchers and businessmen depend upon ranching and farming resources tosupport their families, business, and a tax source to support local government, schools, roads, etc.. If livestock numbers were cut, it would lower our tax base.

Camping, vacationing, and hunting gives a feeling of "well being" to local residents and visitors. We have learned to appreciate this as a way of life we wish to share.

There is no guarantee that the other alternatives suggested would be successful. Change does not always bring the anticipated blessings.

The no action policy would add to the economic growth of the area, state, and nation. Any other changes could cause an adverse economic burden.

Sincerely yours
Jack Billingsley
Jack Billingsley



94223

Support A + D

Statement of Stan Etchart on C.M.R. Refuge

A + D Combination

give name + address

My testimony would be to support alternative A, the "no action alternative" and to oppose the alternative offered by ~~the~~ U.S. Fish + Wildlife which would cut livestock numbers and threaten the tenure of cabin users and other multiple use users.

I would commend the Fish and Wildlife Service for offering an alternative which would in effect endorse the management developed over the last 40 years and hopefully to build upon successfull relationships and practices developed over that period of time.

I had occasion to discuss with Senator Metcalf shortly after the passage of the legislation which gave sole jurisdiction of the CMR to Fish + Wildlife his thoughts on the subject. ~~[illegible]~~. He assured me many times that Congress was simply making one agency responsible for the management of the C.M.R but that beyond that no legitimate use allowed at that time need feel threatened. ~~Thus and~~ I feel the U.S. Fish + Wildlife Service would do well to read and interpret the intent of Congress in passing jurisdiction over CMR to the single agency. I feel that Congress intended no change, no threat to multiple use, no cuts in long standing grazing numbers, or threats to hunter access or use by cabin site lessees -

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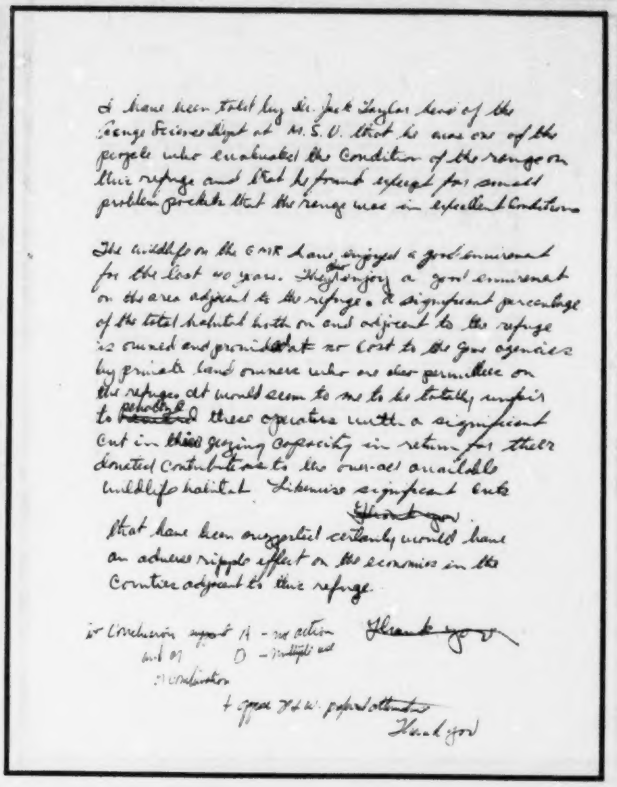
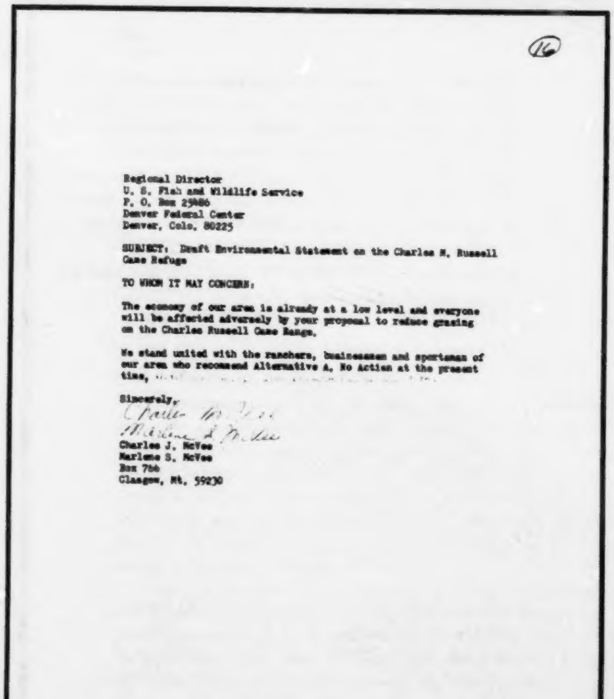


I have been told by Dr. Jack Taylor head of the Range Science Dept at M.S.U. that he was one of the people who evaluated the condition of the range on this refuge and that he found except for small problem pockets that the range was in excellent condition.

The wildlife on the CMR have enjoyed a good environment for the last 40 years. They also enjoy a good environment on the area adjacent to the refuge. A significant percentage of the total habitat both on and adjacent to the refuge is owned and provided at no cost to the Gov agencies by private land owners who are also permittees on the refuges. It would seem to me to be totally unfair to penalize ~~[illegible]~~ these operators with a significant cut in their grazing capacity in return for their donated contributions to the over-all available wildlife habitat. Likewise significant cuts ~~Thank you~~ that have been suggested certainly would have an adverse ripple effect on the economies in the counties adjacent to this refuge.

in conclusion support A - no action
and or D - multiple use
in combination
~~Thank you~~
+ oppose F+W. proposed alternative
Thank you



(16)

Regional Director
U. S. Fish and Wildlife Service
P. O. Box 25486
Denver Federal Center
Denver, Colo. 80225

SUBJECT: Draft Environmental Statement on the Charles M. Russell Game Refuge

TO WHOM IT MAY CONCERN:

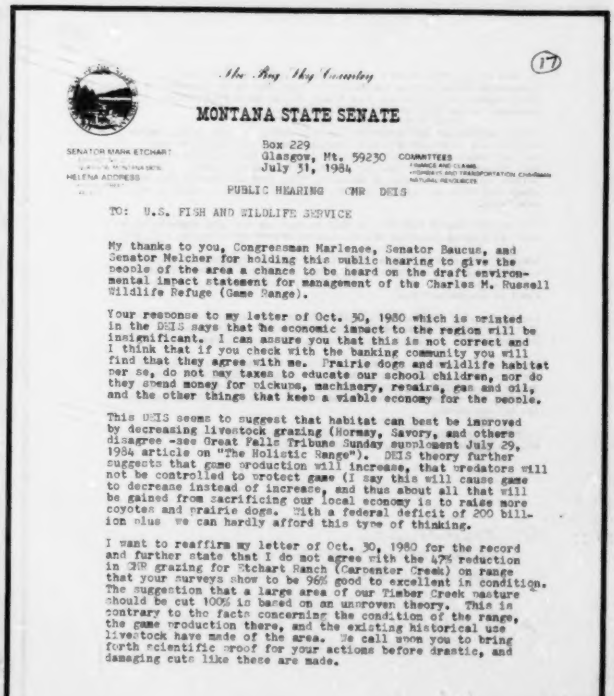
The economy of our area is already at a low level and everyone will be affected adversely by your proposal to reduce grazing on the Charles Russell Game Range.

We stand united with the ranchers, businessmen and sportsmen of our area who recommend Alternative A, No Action at the present time.

Sincerely,

Charles McVee
Marlene S. McVee

Charles J. McVee
Marlene S. McVee
Box 766
Glasgow, Mt. 59230



(17)

The Big Sky Country

MONTANA STATE SENATE

SENATOR MARK ETCHART
HELENA ADDRESS

Box 229
Glasgow, Mt. 59230
July 31, 1984

COMMITTEES
FINANCE AND CLAIMS
HIGHWAYS AND TRANSPORTATION CHAIRMAN
NATURAL RESOURCES

PUBLIC HEARING CMR DEIS

TO: U.S. FISH AND WILDLIFE SERVICE

My thanks to you, Congressman Marlenee, Senator Baucus, and Senator Melcher for holding this public hearing to give the people of the area a chance to be heard on the draft environmental impact statement for management of the Charles M. Russell Wildlife Refuge (Game Range).

Your response to my letter of Oct. 30, 1980 which is printed in the DEIS says that the economic impact to the region will be insignificant. I can assure you that this is not correct and I think that if you check with the banking community you will find that they agree with me. Prairie dogs and wildlife habitat per se, do not pay taxes to educate our school children, nor do they spend money for pickups, machinery, repairs, gas and oil, and the other things that keep a viable economy for the people.

This DEIS seems to suggest that habitat can best be improved by decreasing livestock grazing (Hormay, Savory, and others disagree -see Great Falls Tribune Sunday supplement July 29, 1984 article on "The Holistic Range"). DEIS theory further suggests that game production will increase, that predators will not be controlled to protect game (I say this will cause game to decrease instead of increase, and thus about all that will be gained from sacrificing our local economy is to raise more coyotes and prairie dogs. With a federal deficit of 200 billion plus we can hardly afford this type of thinking.

I want to reaffirm my letter of Oct. 30, 1980 for the record and further state that I do not agree with the 47% reduction in CMR grazing for Etchart Ranch (Carpenter Creek) on range that your surveys show to be 96% good to excellent in condition. The suggestion that a large area of our Timber Creek pasture should be cut 100% is based on an unproven theory. This is contrary to the facts concerning the condition of the range, the game production there, and the existing historical use livestock have made of the area. We call upon you to bring forth scientific proof for your actions before drastic, and damaging cuts like these are made.

page 2

Your final action should be to adopt the Sept. 29, 1980 (see DEIS) letter from Senator John Melcher and Congressman Ron Marlenee which states: "a new alternative should be developed which provides for range improvements and improved grazing systems, along with some season of use modifications that would provide enhancement on the domestic livestock grazing program proposed in the presented Draft Environmental Impact Statement". Melcher and Marlenee further suggested that you "recognize the domestic livestock grazing as a legitimate use of the Refuge instead of treating it as a threat".

Senator Baucus in his statement on that DEIS says "I am urging the Fish and Wildlife Service to examine further any alternative for improving wildlife habitat other than the suggested 33 percent cut in A.U.M.s (Animal Unit Months) on grazing allotments".

My suggestion is that the Fish and Wildlife Service adopt Senator Baucus's Senator Melcher's and Congressman Marlenee's suggestions and further incorporate provisions in alternative D (multiple use) which would increase local employment in the tourist industry by 40% by year 2005, and also add $1,653,392 to sales with 37% increase in area employment.

In conclusion I support the multiple use management of the C.M.R. I dispute DEIS statements alleging that these management options are not available at this time. I further contend that Executive Order 7509, and the 9th Circuit Court of Appeals decision contains all the authority and flexibility needed for a reasonable, workable, viable, and sensible managementof the Charles M. Russell Wildlife Refuge (Game Range). [illegible]

Sincerely,

Mark Etchert

Mark Etchert

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760 5th St. N.
Glasgow, Mt. 59230

Fish and Wildlife Service
Regional Director
Box 25486
Federal Center
Denver, Colo. 80225

Sir:

I gave this testimony at the meeting in Glasgow, Mt. July 31 and I lost my notes so this is very close to my testimony, as my memory allows.

My name is Ralph E. Dreyer, formerly of Circle, Montana in Mc Cone County but I now live in Glasgow, Mont. I have worked on and operated Ranches for over 45 years in McCone County. 1943 was the first time I saw deer on my place but antelope were always there.

In 1948, we got 1080 and got rid of a lot of coyotes. The antelope and deer population exploded. Check with the number of licsence sold in the 50's and 60's.

There are 4500 to 6000 head of sheep on McGuire Creek going South across Nelson and Timber Creek to Flowing Well. About 168 sections are sheep tight fences. We have had several hard winters that have killed a lot of antelope and deer. Chrck with Mont. Fish, Wildlife and Parks for figures.

Why are you kicking all of the sheep off the C.M.R. when sheep, cattle, and wildlife are compatible to each other, Ranchers need to be diversified to be able to make a living. Sheep, cattle and wildlife don't all eat the same plants. Each has its own taste and liking.

We have prairie dogs on Nelson Creek that have destroyed the vegetation and sand blows any direction and there is not enough vegetation to feed a sheep or to live on in some places. I have fought prairie dogs for about forty years. McGuire Creek to Timber Creek are being seeded down with new towns. Just because someone flew over a prairie dog town on Nelson Creek and thought he saw a furrow to a dog hole, we are suppose to have Black Footed Ferrets.

I am against Amendment B and for A & D

Thank You

Ralph E Dreyer

Ralph E. Dreyer

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(24)

My name is Kim Enkerud and I am speaking on behalf of the Badland Cooperative State Grazing District. We would like to go on record as being opposed to Alternative B as stated in the Draft Environmental Impact Statement of the Charles M Russell Game Range.

We feel an average cut of 33% in regard to livestock aums is ~~too drastic~~. Wildlife and livestock have been cohabitating on this described area for many years without harm to either class. In fact wildlife numbers have increased. There could be a possibility that the numbers of the primary species called for in Executive Order 7509 are already present along with secondary species that are supposedly needed to make up this game range.

The economic impact that will be felt by this aum cut will drastically hurt the communities where monies received from livestock sales are used.

Beside livestock numbers, recreation uses will be changed. If wildlife numbers are to be increased, hunting will probably be somewhat reduced to gain this increase. This in turn will cause less recreation dollars to be spent in the communities.

Mainly, however, the rancher himself will be hurt the greatest. Gone will be a portion of his much needed income which supports himself, his family, and his livlihood. Many could be put out of business.

We would recommend a multiple use approach to solving this so called conflict between wildlife and livestock. Multiple use benefits all parties involved, hurting none, helping all. The DEIS even shows positive efforts on all areas connected with using the CMR when multiple use is considered.

Therefore, we again would like to state our opposition to Alternative B, and our support for Alternative A or Alternative D.

To Regional Director
P.O. Box 25486 Denver Federal Center
Denver, Col 80225

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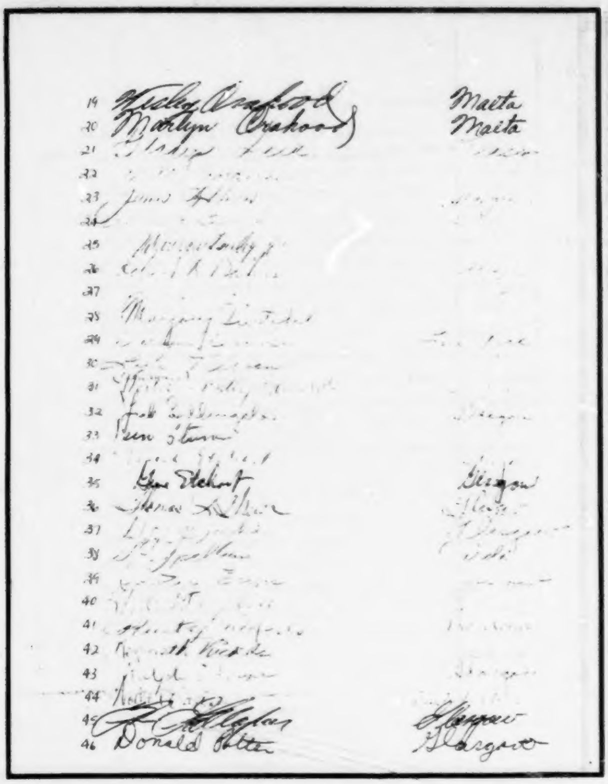
(24)

We, the undersigned, are against the proposed alternative, B, found on pages 9-17, in the Draft Environmental Impact Statement dated February 23, 1984 of the Charles M Russell Game Refuge (Range). Instead, we support the No Action, A, alternative on pages 7 and 8. If alternative A is not adopted, we ~~recom~~ recommend adopting the multiple use alternative, D, on pages 21 and 22. We also are against ~~a~~ alternatives C + E

	Name	Address
1	[illegible]	[illegible]
2	[illegible]	[illegible]
3		
4	[illegible]	Jordan
5	[illegible]	[illegible]
6	William H Nicol	Glasgow
7	[illegible]	Jordan
8	[illegible]	[illegible]
9	[illegible]	[illegible]
10	[illegible]	[illegible]
11	[illegible]	[illegible]
12	Steve Enkerud	Glasgow
13	Barry D Billingsley	Glgw.
14	Wall A Wetz	[illegible]
15	Walt Collins	Ft Peck
16	Beverly Lawson	Hinsdale
17	E H Bouchard	Hinsdale
18	[illegible]	[illegible]



19 Wesley Crawford — Malta
20 Marilyn Crawford — Malta
21
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23 James
24
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26
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28 Margaret
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33 Pen Storm
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35 Gene Stehorst — Glasgow
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42 Kenneth
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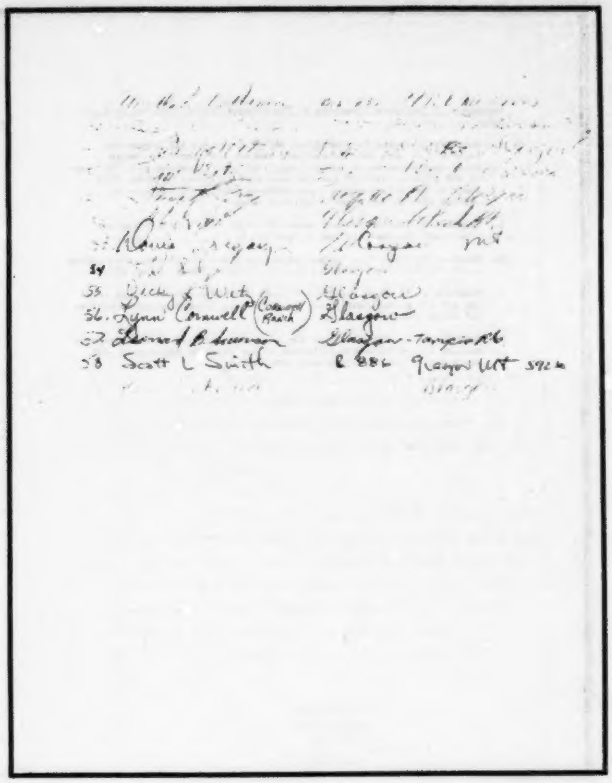
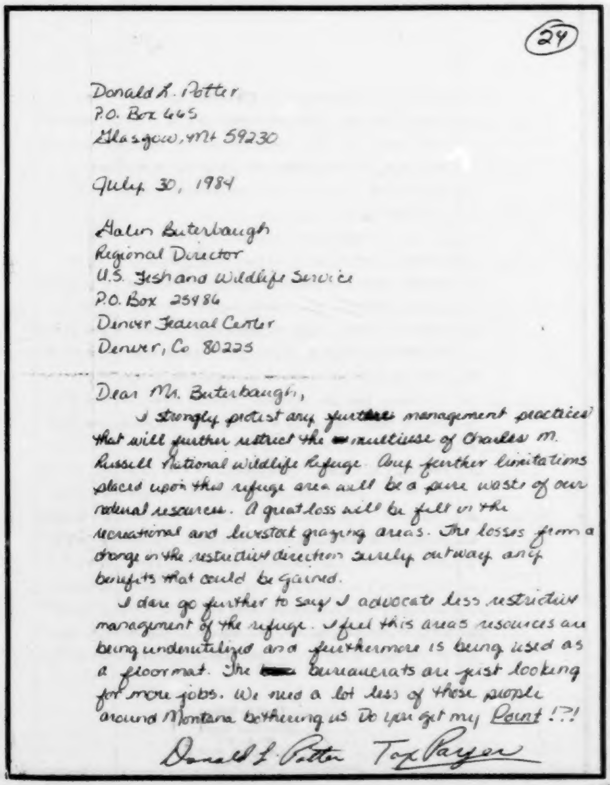
45 Gallagher — Glasgow
46 Donald Potter — Glasgow



53 — Glasgow MT
54 — Glasgow
55 Becky — Glasgow
56. Lynn Cornwell (Cornwell Ranch) — Glasgow
57 Leonard B. — Glasgow-Tampico Rd
58 Scott L Smith — R 886 Glasgow MT 592



(24)

Donald L. Potter
P.O. Box 465
Glasgow, Mt 59230

July 30, 1984

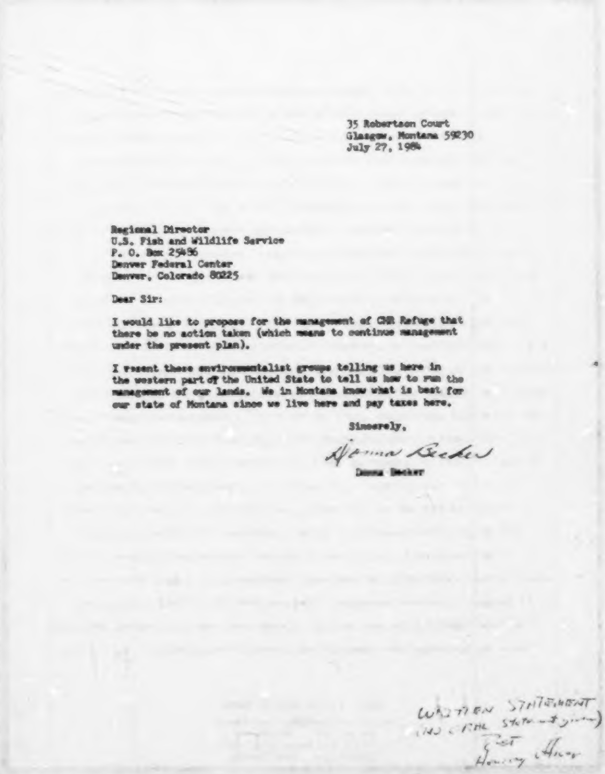
Galen Buterbaugh
Regional Director
U.S. Fish and Wildlife Service
P.O. Box 25486
Denver Federal Center
Denver, Co 80225

Dear Mr. Buterbaugh,

I strongly protest any further management practices that will further restrict the multiuse of Charles M. Russell National Wildlife Refuge. Any further limitations placed upon this refuge area will be a pure waste of our natural resources. A great loss will be felt in the recreational and livestock grazing areas. The losses from a change in the restrictive direction surely outway any benefits that could be gained.

I dare go further to say I advocate less restrictive management of the refuge. I feel this areas resources are being underutilized and furthermore is being used as a floormat. The bureaucrats are just looking for more jobs. We need a lot less of these people around Montana bothering us Do you get my Point !?!

Donald L. Potter Tax Payer



35 Robertson Court
Glasgow, Montana 59230
July 27, 1984

Regional Director
U.S. Fish and Wildlife Service
P. O. Box 25486
Denver Federal Center
Denver, Colorado 80225

Dear Sir:

I would like to propose for the management of CMR Refuge that there be no action taken (which means to continue management under the present plan).

I resent these environmentalist groups telling us here in the western part of the United State to tell us how to run the management of our lands. We in Montana know what is best for our state of Montana since we live here and pay taxes here.

Sincerely,

Donna Becker

Donna Becker

WRITTEN STATEMENT
(NO ORAL STATEMENT given)
Rcd
Hearing

Responses to Testimony Presented at the Glasgow Public Hearing, July 31, 1984

1. Response to Walter Collins (page 15)--The way the HEP procedures (Appendix 2) were used to evaluate habitat and ascertain needed management measures to improve wildlife habitat assured that the needs of the primary wildlife species specified in Executive Order 7509 would be met before and/or with measures that would be taken to enhance habitat for other wildlife species.
2. Response to Charles Barnard (page 18)--Yes, they were considered. Please see the last entries of Appendix 5.
3. Response to Gregory L. Pauley (page 29)--There are 94 vehicular access points to Fort Peck Reservoir and the Missouri River inside CMR.
4. Response to Mr. Page (page 54)--Please see paragraph 6 on page ii of the EIS for an explanation of the difference between wildlife habitat and range condition.
5. Response to Mr. Hammond (page 83)--Although the wolf is an endangered species and is therefore protected in the Rocky Mountain area, FWS would oppose its reintroduction onto CMR.

Public Hearing on the Draft Environmental Impact
Statement for the Charles M. Russell Refuge

August 1, 1984
7:30 p.m.
Trade Center Building
Lewistown, Montana

Hearing Officer: Richard K. Aldrich
Office of the Solicitor
P.O. Box 1538
Billings, Montana 59101

MR. ALDRICH: Good evening, ladies and gentlemen. This is the time and place set for the public hearing to receive comments on the Draft Environmental Impact Statement and discussing management alternatives for the Charles M. Russell Wildlife Refuge. My name is Richard Aldrich. I'm a staff attorney in the office of the Field Solicitor in Billings, Montana. I have been designated the hearing officer for this proceeding by the Fish and Wildlife Service.

The purpose of this hearing is to receive oral and written comments from the general public on the Draft Environmental Impact Statement discussing management alternatives for the Charles M. Russell National Wildlife Refuge. On March 21, 1984, the Fish and Wildlife Service published notice in the Federal Register inviting the general public of the availability of the Draft Environmental Impact Statement on the management of the C.M. Russell National Refuge. This is a copy of the Draft Environmental Impact Statement. We have several more copies in a box back here if anybody would like to pick one up this evening. Anybody who hasn't read it should feel free to take one with them as long as they last. After the notice in the Federal Register of the availability of the Draft Environmental Impact Statement, we received a number of requests from interested parties that public hearings be held on the Environmental Impact Statement and that the comment period should be extended. By Federal

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Register notice of July 11, 1984, the Fish and Wildlife Service announced that the comment period had been extended until August 15, 1984, and that notice also established the dates and times and places for three public hearings in Glasgow last night, in Lewistown tonight, and Missoula tomorrow night.

Before we get into the testimony, I'd like to discuss a few of the rules that we would like to try to proceed under here tonight. Everybody who came in we asked that you fill out an attendance card. This is for two reasons: First of all, we would like to know who has attended and who is interested in what we're doing here tonight. And also, if you wish to make a presentation tonight we would appreciate that you so signify on that card. We will call the witnesses this evening in the order in which they have registered. If, however, there are special circumstances requiring that you get home early, or what have you, we will try to make exceptions, but we will try to keep to a first come first serve basis, if possible. We're making a verbatim recording of what goes on here tonight. This young lady over here typing on the stenotype machine is taking down everything I'm saying and will take down everything you all say. After the hearing has been closed, a verbatim transcript of the hearing will be included in the official record of the hearing and will be forwarded to the director of the

Fish and Wildlife Service for use in preparing the final Environmental Impact Statement.

Last night we had 27 people who spoke. I don't know how many have registered thus far, but based upon last night's attendance, we're going to limit you to a five-minute statement. I will give you a warning after four minutes have expired to let you know how you're doing as far as what you're trying to say. If you have prepared a written statement please summarize your written statement for the hearing record and submit your complete written statement to the Court Reporter so that she can include it in the transcript of the proceedings. If we have some time after everybody has had an opportunity to speak and if there is somebody that has not had an opportunity to say everything that they wanted to say, we will try to take care of those kinds of problems. Additional written comments may be submitted for consideration by the Fish and Wildlife Service in preparation of the final Environmental Impact Statement until August 15, 1984. Please submit your written comments to Galen Buterbeaugh,the regional director of the Fish and Wildlife Service, Box 25486, Denver Federal Center, Denver, Colorado, 80225, or to Ralph Fries, the refuge manager here in Lewistown, Box 110, 59457.

As I stated earlier, the purpose of this hearing is a public hearing to receive comments on the adequacy of

the Draft Environmental Impact Statement. It's not a debate and it's not a question and answer proceeding. We're looking for your comments on the Draft Environmental Impact Statement. Please allow each speaker the courtesy of making his or her presentation without interruption.

Representing the Fish and Wildlife Service here tonight are Ralph Fries the refuge manager here in Lewistown and Barney Schranck the Montana and Wyoming refuge supervisor representing the regional directors, Denver, Colorado. Also present are Larry Malone the assistant refuge manager, Kim Forest an assistant refuge manager, and Bill Haglan a wildlife biologist.

Again, before we go in to the statements by those of you who came to present statements, I'm going to have Ralph Fries give you a short presentation on how we got to this point and where we plan to go for now. And then we'll get into the witnesses.

MR. FRIES: Good evening. The Charles M. Russell National Wildlife Refuge was established in 1936 as the Fort Peck Game Range. The Game Range was administered jointly by the Fish and Wildlife Service and the Bureau of Land Management. This resulted in continual conflicts for 40 years as the two agencies have different goals.

For a short period in 1975 and early 1976, the

area was managed solely by the BLM. But, on February 27, 1976 the U.S. Congress passed Public Law 94-223 giving sole responsibility for management of the area to the Fish and Wildlife Service, and changing the status of the area from Range to Refuge.

When the Fish and Wildlife Service accepted responsibility for management in 1976, it also accepted a part of a pending law suit that required an Environmental Impact Statement, commonly referred to as EIS, be prepared.

A special team was assembled and over a period of three years a Draft EIS was prepared. Public hearings were held on that Draft EIS in 1980. However, a court suit delayed the issuance of a final EIS. On January 14, 1982, U.S. District Court in Billings, Montana, ruled quote: "We have decided that the ranchers are entitled to have grazing declared a co-equal priority with wildlife conservation and thus we must conclude that C.M.R. must still be administered under the Taylor Grazing Act."

However, the district court's decision was appealed to the United States Ninth Circuit Court of Appeals. On October 14, 1983, the appellate court overturned the district court and ruled that, quote:

"1. Wildlife has priority in access to the forage resources of the range up to the limit specified in Executive Order 7509;

2. Beyond those limits, wildlife and livestock have equal priority in access to the resources of the range; and

3. The range is to be administered under the Wildlife Refuge Act."

The Wildlife Refuge Act refers to the National Wildlife Refuge System Administration Act of 1966.

Thus, it is clear that the wildlife has priority on the refuge and the Taylor Grazing Act provides no rules or regulations pertaining to refuge operations.

Due to a delay of several years, the Fish and Wildlife Service decided to issue a revised Draft EIS. The public input received through earlier public review has been considered in preparing this Draft EIS. The meeting tonight concerns this revised Draft EIS. The refuge goals and the wildlife, range, and recreational objectives are listed on pages four through six. Five alternatives are analyzed in the Draft EIS.

The most controversial part of the Draft EIS is the grazing program. The five alternatives analyze the grazing program from no change to total elminiation of grazing, with three alternatives between these two extremes.

The Fish and Wildlife Service is not opposed to grazing on the refuge. In fact, in the proposed Fish and Wildlife alternatives, it is proposed that we graze about

40,000 AUM per year. At present there about 60,000 AUMs authorized for grazing.

Also, from comments received on the first Draft EIS, it was apparent that many persons confused range condition and wildlife habitat condition. It should be remembered that these two items are not the same.

Please remember the deadline for any written comments is August 15, 1984.

MR. ALDRICH: When you come to give your testimony or make your statement I would appreciate if everybody come up and please use the microphone, it will make it easier for the Court Reporter to hear and for everybody else to hear as well. Please state your name and your residence. Please advise us if you're representing any particular organization, and if you have a written statement please summarize it and give the written statement to the Court Reporter. If you don't have a written statement just go ahead and say whatever it is you want to say. If you have a written statement it will be very helpful to give it to the Court Reporter. The first speaker is Ernest Zahn.

MR. ZAHN: Well, I'd just like to know if you're going to keep raising these grazing fees or are you going to leave them the way they are. I'd like to find out how much 1

you're going to charge. I heard you're going to charge eight dollars a head next year. And you've been raising it every year and I've got 18 head out there and I'd like to know what you're going to do, if you're going to raise them or if you're going to cut them plum off.

MR. ALDRICH: Mr. Zahn, the purpose of this hearing today is to comment on the Draft Environmental Impact Statement. I don't think these gentlemen are in a position right now to be able to answer questions. However, I'm sure they would be glad to answer your question if you would like to call them in the office.

MR. ZAHN: Well, I've already told them in the office, but that's what I'd like to know.

MR. ALDRICH: Frank Martin.

MR. MARTIN: I am Frank R. Martin, Lewistown, Montana. I represent the National Wildlife Refuge Association, a private, non-profit organization with a nation-wide membership.

About three years ago our national president, Forrest A. Carpenter, submitted a statement on the proposed Draft Environmental Impact Statement for the C. M. Russell National Wildlife Refuge. Mr. Carpenter asked me to attend this meeting and comment on the current Draft EIS.

We again endorse the Proposed Alternative B as a

minimum to meet the requirements of a National Wildlife Refuge with two exceptions:

Exception No. 1 - We cannot agree with the statement: "Private cabin sites would not be affected at this time." There is no place for private cabins on a wildlife refuge. This would be a nonconforming use.

Exception No. 2 - Page 13 states, in part, "So far approximately 50 miles of fencing needs have been identified along the CMR boundary . . . ." This is not enough boundary fence if CMR is to meet its wildlife commitments.

In summary, we support Proposed Alternative B, as a minimum requirement for this most important National Wildlife Refuge. Thank you for the opportunity to make this statement.

MR. ALDRICH: Bill Harris.

MR. HARRIS: I'm Bill Harris from Winnett. I had no intention of making a statement here until I found out it was going on the record and I thought it was probably a good time to do it. I don't have any written statement, but I don't think I need one. No one else has to tell me what to say tonight because it effects me enough that I can probably get across the point I have.

I support the no change aspect of this EIS for the reasons that it can be proven very easily -- and it has been -- that the EIS as written is based upon false statements

and constructed lies, I would say, or platform, if you will, that really is a pretty difficult thing to address. It's pretty hard to go over facts that are facts only because they're printed and to make sense out of them. So I guess about all I want to say is that and I guess the fact that even though this is the good old U.S.A. and this is the fashion of our government that's carrying this thing on here, I'm still proud of the country. It's the greatest there ever was, but I'm pretty ashamed of what it stoops to and the situations that the people have to, I guess, live under to just be here and keep struggling for what we believe in.

But I also see that we're kind of famous for our nondiscriminatory way of life that we recognize everybody's feelings and everybody's shortcomings, but it seems like it's only in job structure with this government of ours at this point and I think it's time that people thought a little bit more about discrimination in situations like this where we're talking about government leases and we're subject to the will of the government. So, you know, that's just about all I have to say. I guess there was someone in Manhattan that gave away bees, so I thought maybe there would be a box of bees, maybe we'll get them later.

MR. ALDRICH: James Phelps.

MR. PHELPS: My name is James Phelps. I reside at

Billings. I have had a long time interest in this CMR. I've been on it I don't know how many times. I've testified at the previous hearing held in 1980. I think I know a little bit about it. I'm not going to call anybody any names, so doing only creates and adds to controversies, but does not solve them. The previous speaker mentioned about tolerance, and I hope you extend that to me. This now refuge has been in controversey, as was pointed out, ever since it was established in 1936.

I favor and support Alternative B because I believe it is the best proposal that meets the requirements set out by the Ninth Circuit Court of Appeals in its decision, and at the same time causes the lease disruption to the many interests involved. As you know, this requires an average reduction of grazing amounting to about a third, 33 percent, and this is average. Some will take more and some will take less. I understand the adjustments are to be made over a five-year period. I repeat what I said in 1980: the five-year period should not be cast in concrete, the time frame should be flexible as long as the goals regarding the management of the refuge are met. And there are some ways to assist this. I'm glad to see that this is in the new Draft EIS. There is some ways to assist in this reduction.

One: When the game range was first established, I have been told there was a plan, then proposed, to expand

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the range in order to make it more complete. This additional land acquisition would have taken into consideration the natural boundaries where possible, the migrations of big game between summer and winter, and more variety in vegetative types to accomplish those things. It is well recognized the present boundaries are artificial, running on section lines in nearly all instances. And given the character of the country, even with adjustments much boundary would still be on section lines. The economy was in dire shape prior to World War II and the government was buying up land, abandoned homesteads and the like, from those only too glad to get the $15.00 to $20.00 per acre that was offered. The ranch economy was having its troubles. And it's having them again. And while no one is looking for any such prices as $15.00 and $20.00 an acre, perhaps it's relative. And land so bought, I should emphasize, would come from willing sellers only. I think the time has come to look into this. Our congressmen should be incouraged to explore the possibilities. The Land and Water Conservation Fund may be one source. This idea has the possibilities of reducing conflicts. The grazing alottments thus released could be applied to assist remaining operators, although in practice this might not be as easy as it sounds. When they build the Fort Peck Dam in 1942, the idea was to stop the flow of people away from these counties, but it hasn't done

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it and outfits keep getting bigger and ranches getting smaller.

Two: Private lands within refuge boundaries total nearly 50,000 acres. They vary greatly in size. Alternative B recommends several priority land purchased to be gained from willing sellers. Additional purchases would occur as money becomes available. So if that applies, through my other option, to buy out willing sellers, especially in these depressed times, it would reduce conflict.

Three: There are nearly 36,000 acres of state lands. And these should be exchanged with the State of Montana for other federal lands. State lands, according to Montana law, are in just about the same category as private lands and as a practical matter on the CMR, according to the Draft EIS.

MR. ALDRICH: You have one more minute.

MR. PHELPS: I have heard that subleasing of grazing occurs. I am sure this is against the National Wildlife Refuge regulations. And if this allegation is in deed true, I urge these alottments be cancelled. 2

Alternative D says -- and that's about the way the BLM would manage it -- says there's a 17 percent reduction, so, you see, a lot of it is still overgrazed. Alternative A and D are written to provide comparisons. Alternative D would have to have legislation to bring it into effect. And

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that isn't going to happened. In 1974 they tried to do away with the game range and the result was legislation was passed and it was put into a refuge, so I don't think that would go anywhere again.

One other thing, I think we ought to have hearings in Billings. There are a lot of people in Billings that use that refuge who couldn't come up here, and it's as logical to hold hearings there as it is here. Thank you.

MR. ALDRICH: Thank you, Mr. Phelps. I notice there's one other tie in the room today and I probably should recognize him. In the audience is Cy Jameson. I'm not sure which hat you're wearing today, Cy.

Gordon Weber.

MR. WEBER: I'm Gordon Weber of Billings and I visited the refuge on several occasions and patronized businesses in the various communities and I hope to do so many years in the future, in spite of my age. It is my opinion after viewing the Environmental Impact Statement that Alternative B should be the one adopted. Thank you.

MR. ALDRICH: Thank you Mr. Weber. George Wilson.

MR. WILSON: I'm George Wilson, a rancher from Garfield County and I have a grazing permit on the CMR. I'm writing a comment letter on, I hope, the final EIS on the

CMR.

I do not think any of the cattle permits should be cut as the range survey conducted by Robert Ross, Claude Dillon, Phillip Van Cleave and Hugh Cosby in 1979 showed my permit to be 81 percent good and nine percent excellent and four percent poor. The other ranches compared favorably to mine. If you think the range needs improving, why don't you get rid of the Canadian thistles, cockle burs, fox tail and other noxious weeds growing between the high and low water mark on the shore line of this lake? I'm quite sure if you don't do something with these noxious weeds, your next lawsuit will be with the State Weed Control Board. You claim to be habitat managers, please tell me what wildlife thrives in Canadian thistle, fox tail and cockle bur! You say you can't interrupt the ecology of the range by seeding other grasses but the ecology of this land has already been erupted by man as the waves from the water has cut a lot of these grassy points back at least one-quarter mile and there's nothing but a pile of rocks there now. The best thing you could do would be to try and seed it to sweet clover and Reeds Canary grass, or something similar. I notice there is a big concentration of your wildlife on sweet clover that some rancher has seeded in the past. For God's sake please do something constructive on this CMR for a change with all the money you're spending on studying and writing EIS.

You claim overgrazing to be all the problem on the CMR. If you will seed this shoreline to Reeds Canary grass and sweet clover, there will be more feed than all the game and livestock can eat. You'll still have nearly all the feed back in the hills for winter feed as the cattle won't hardly leave the shoreline feed in summer.

Why don't you improve the forage like Shelton Game Refuge in Nevada has and increase the ranchers permits instead of cutting them. The ranchers on Shelton Game Range are really satisfied with their manager and grazing on Shelton, as I personally talked to John Weber, president of the National Cattlemans Association, who has a permit on it. He said they get along and work together and if they have problems they get together and work them out. They got an increase on their grazing permits and they got together and trapped and sold quite a number of wild horses and were able to increase their allotments. I know with seeding the shoreline and improving water where else it's needed, we wouldn't be seeding all of eastern Montana to Canadian thistle.

I don't see why the Fish and Wildlife Service doesn't go on the same fee schedule that the BLM and Forest Service does as it's the only fair way to charge for grazing.

I do want to commend the Fish and Wildlife Service for helping fix fence and building new fences where needed. Also, I really think their move slips are a good deal as you

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get credit if you move off early or turn in late. This is a lot better system than BLM has.

I also think it's only fair to the public that the Fish and Wildlife Service should publish a financial report every year itemizing what is spend on CMR just like banks have to do, then we'd know where we're at.

In closing, I'm definitely against any action that will cut grazing. I'm in favor of no action without the mitigating measures, except multiple use. Increase forage by seeding grass and clover and improving water where needed.

MR. ALDRICH: Thank you, Mr. Wilson. William Snapp.

MR. SNAPP: I don't believe I have a statement to make.

MR. ALDRICH: D. A. McRae.

MR. McRAE: My name is Al McRae and I'm representing First Bank, Lewistown, Montana. And this is in reference to the Draft Environmental Impact Statement for management for the Charles M. Russell Wildlife Refuge.

First Bank Lewistown registers support for the objectives proposed in the multiple use alternative of the Draft Environmental Impact Statement for management of the Charles M. Russell Wildlife Refuge. Authority for this

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action is contained in Executive Order Number 7509 and the U.S. Circuit Court of Appeals decision. Until implementation of this, First Bank Lewistown supports the no action alternative.

Agriculture is the number one industry of Central Montana. We believe it will continue as such in the foreseeable future; therefore, we feel multiple use concept of the Charlie Russell Wildlife Range will sustain the agricultural use of the area, maintain the tax base, provide increased wildlife habitat and increased recreational use. Thank you.

MR. ALDRICH: Robert Dolezal.

MR. DOLEZAL: I'm Bob Dolezal, a rancher from Roy. I just want to make a few comments on the process of determining the grazing units. One of the criteria was to set the grazing on the amount of birds that were out there, particularly sharp tailed grouse, if you read your statements. This was originally set up for the benefit of the sharp tail grouse. I don't believe there's any great many, other than antelope, mentioned in the original program. The figure they have on the grouse population, I believe, is extremely high and under no circumstances could we reduce grazing to accomodate this among the birds. I don't think you could raise that many birds with ideal conditions. It is certainly not an ideal area for sharp tailed grouse.

Another comment I want to make is that in the no grazing section of their statement it stated that they were going to burn off areas to increase the shrub population. Now, I have been involved in range management for quite a few years and one of the methods we use for reduction of those things is fire. Fire will reduce the shrub for perhaps 20 years. And so I see quite a few variances from reality with the statements made. These things just aren't going to work according to the statements made in there.

Another thing they talk about is five years on their 33 percent cut. I was cut 33 percent several years ago and I didn't get any five years to adjust. You're cut 33 percent and that's it. So I think the dyu had already been cast on this range many years ago and we're just going through the formalities to kind of at least make it legal anyway. I think our management is insufficient out there. For the range, it's necessary to have a certain amount of large livestock to keep the range in condition. It's necessary sometimes to actually overgraze some of these ranges to keep them in proper management. I would give you an example, but I don't have the time now to go through this all, but if you want to look up -- the Kansas Grass Lands is a good example of an area that was half managed as a grazing district, and half of it was reserved for strictly wildlife.

After 50 years of strictly wildlife, we burn it off and reseed it to grouse because there was nothing left due to the lack of large animals and proper grazing. That's all I have to say.

MR. ALDRICH: Thank you Mr. Dolezal. Dave Houston.

MR. HOUSTON: I'm Dave Houston from Brusett down there on a little one cylinder ranch down there, about a 125 head of cows on the Charles Russell.

This Draft Environmental Impact Statement is full of lies from cover to cover. This whole CMR deal from 1976 until now has been mismanaged and handled in the most underhanded way. They have wasted around a million dollars a year at the CMR since '76 and all they have done is cause a lot of trouble. All that the local people have expected out of this deal was that some truth and common sense be used. We haven't had any of either yet and in their proposed action plan it is plain to see that they don't intend to use any truth or common sense in it either. The local ranchers around the CMR contribute a hell of a lot more to the wildlife than the U.S. Fish and Wildlife does and it doesn't cost the tax payers a million dollars a year either.

At least two-thirds of the game and birds that are on private land around the CMR and are on real hard winters -- the only grouse and wild turkeys that survive are the ones

that winter on the local rancher's feed grounds. We wonder why the CMR management tries to convince everyone that we are a bunch of bandits. The 1978 range survey shows that there is no need for cut in livestock. If they would develop more water holes on the CMR, it would scatter the game and livestock and be better for everything, but so far they have refused because they are afraid more water might help the local ranchers. They cry their eyes out because the grouse don't increase more. Like everything that takes common sense, they don't know that grouse never nest more than a half mile from water, plus the fact that the eagles are working on them all the time and the coyotes they are raising are breaking up their nests and eating their eggs. This is exactly the same reasons the wild turkeys are getting scarcer all the time. Last winter was the largest deer kill by coyotes we have ever seen. Every one that is riding the range finds them everywhere. Some people on snowmobiles saw over 100 deer kills on the ice in about 25 miles. The coyotes killed way over half of last year's fawns last winter and have started in on this year's fawns now.

In this Draft Environmental Impact Statement they try to cover up their mismanagement of this by saying that they are not interested in numbers, they are only interested in habitat. Too bad they can't find one other word in their vocabulary besides habitat. They don't know habitat from

rat-a-tat. The fact of the matter is, they don't know resource from intercourse. In this DEIS they tell us how many people will visit the CMR by the year so and so. What a simple minded statement. Nobody knows that there may be twice that many or half that many, or maybe none at all. The price of gasoline will have something to do with that. They let on like they won everything in the decision from the Ninth Circuit Court of Appeals -- we just heard that a little while ago. They certainly did not, nor did we win everything either. That decision pins them right down to the original executive order for so many antelope and so many grouse and the rest of the resource goes to the livestock.

They try to convince us that in their proposed action plan that a 33 percent cut in livestock will have very little economic effect.

MR. ALDRICH: You have one more minute, Mr. Houston.

MR. HOUSTON: And that's another false statement. Besides breaking all the ranchers eventually, which is what they aim to do, it will hurt the businessmen we do business with in town and spend money with. Just the threat of having these permits cut has made the price of land drop one-half from land farther out. It is pretty hard to find anyone damn fool enough to want to buy into a mess like the CMR. This is exactly what the Fish and Wildlife intends to do us local people. The word "conflict" is mentioned several times in the DEIS, but they failed to mention that the conflict has all been caused by the U.S. Fish and Wildlife.

They lie to the so-called environmental groups so they will put more pressure on them to get rid of the livestock; such as telling the Audubon Society writer that there is 500,000 cattle on the CMR, knowing that it will be read all over the U.S. and cause hatred towards the local ranchers.

MR. ALDRICH: Your time is up, Mr. Houston.

MR. HOUSTON: You know, when we got these letters from you fellows about these meetings, there was nothing mentioned about a five-minute limit. All we was told is when and what time. So we go to the trouble to write all these things and we've got a hell of a lot more to do instead of sit over a pencil and piece of paper, and when we get here you tell us how many minutes we can have. If that's your rules, that's your rules.

MR. ALDRICH: Mr. Houston, your statement will be included in its entirety in the record --

MR. HOUSTON: It damn well better be.

MR. ALDRICH: -- for the Fish and Wildlife Service. If there is time when we are done I will let him finish.

Gene Buxcel.

MR. BUXCEL: Mr. Chairman, Mr. Fries, the public,

I'm Gene Buxcel. I'm from Jordan, Montana. I'm representing myself, the Garfield County Bank, and the Garfield County Commercial Club. I have five aspects that I'd like to touch on as far as the Draft Environmental Impact Statement that is proposed.

The first one has to do with accessibility to the game range. I guess, as an individual, I feel that accessibility to the game range is one of the main aspects that I have. I enjoy fishing, hunting, etcetera. If this type of situation is to continue, there needs to be cooperation between management, the ranchers, as well as the public, to utilize this resource of wildlife.

The second comment that I'd like to touch upon is habitat. I think rather than looking at cutting off livestock through usage on the game range, we need to look at improving habitat. As has been indicated in some cases, improving the areas that can be improved to increase livestock production, deer, antelope, sharp tail grouse reduction, and that will cause greater accessibility for the rancher, the game person, or the wildlife game range as a whole, if we improve the habitat rather than talking about pulling away and hiding our eyes from the fact that we have to work together.

The third comment that I'd like to add is on the drawback of the livestock by the 33 percent cut, or whatever,

and what effect it's going to have by drawing back and increasing the wildlife numbers up to what is put in the Draft Statement. We will have an increase in predation, which is going to cause a lot of conflict, if I may use the phrase, for the ranchers, as more predation happens on the game range there will be more pressure for the wildlife to move into the livestock areas and cause problems in their feed grounds, haystacks, grain fields, etcetera. It can cause a very extreme case of disagreement between interested parties.

The fourth comment I'd like to add is on the tax basis. By increasing the habitat and the numbers of livestock, we can increase the tax base. The tax base will help every individual. There will be more animals that can be run on it, be more taxes paid on it, greater revenue for the counties involved.

The last one would be the economic conditions and feasibility of the farmers and ranchers. Most industries, farming and ranching included as well as many others, are in a case of very minimal margins as to being able to make their operation work. Most of these people cannot stand the 33 percent cut in their operation and keep a feasible type of operation working. Also, this takes it off the sales market if you have a cut in your range and need to sell your operation to somebody else. They don't want to buy it under less numbers than you were running it. We are looking at trying

to keep people in business, keep people that want to use the game range as a source of hunting, fishing, etcetera, and keep wildlife numbers up and habitats up. We're not looking to run anybody off, livestock, or anything like that. I don't believe any of the counties are. But we also need to look at causing the people that live in the communities, the community themselves, and the livestock numbers as well as the wildlife not to become extinct by having the conflict that is going on. Thank you.

MR. ALDIRCH: Thank you, Mr. Buxcel. Robert L. French, I believe.

MR. FRENCH: I'm Robert L. French and I come from Grass Range, Montana. I'm president of the Grazing Association north of the river from the Robinson Bridge back to the Rockies. This association consists of 25 members who make their living from agriculture. We raise cattle on the CMR and have been down in that area longer than any of the present Fish and Wildlife management.

We're for multiple use in the CMR without any grazing cuts. Livestock is very compatible with wildlife. It is a proven fact that wildlife spends 65 percent of their life on private and deeded lands. Ranchers all up and down the CMR need the grazing they have had in the past. If grazing is reduced in the CMR, it's going to make it double up on your private lands. And you know if we have to double up on our private land who goes first, the wildlife. Who's going to get rid of them? And I don't believe any management of any kind, under any circumstances, can furnish what private land does now for wildlife. Ranchers throughout the years have been the only ones to pay for the privilege of using the CMR. We are also the ones that have to keep up the fences and maintaining the water. Where water is furnished for livestock the ground is covered with tracks of wildlife. So you can just see they're very compatible and it's very good for both.

We wholeheartedly recommend that CMR remain as it is. Thank you.

MR. ALDRICH: Thank you, Mr. French. Dick Knox.

MR. KNOX: My name is Dick Knox and I own and operate a ranch north of Winifred, Montana. I have a direct knowledge of the area north of the river on the CMR from the Robinson Bridge to the UL Bend. This area is very similar to my own ranch in topography and rainfall. I believe I'm qualified to judge rain conditions and game habitat and recognize that they are two different things, in an area so similar to my own.

In 1981 I was fortunate enough to draw an elk permit in the area I have just mentioned. I spent five days

hunting the area. Before I go any further I'd like to expand on that. I'm a rancher, but I'm also an enthusiastic hunter, been so all my life. I've hunted in northwestern Montana extensively for elk in the Bob Marshall, the Great Bear, the Scapegoat Wilderness areas, the North Fork of the Flathead River, the Thompson River, the Bitterroot area. These areas comprise the best elk habitat in northwest Montana. If elk in these areas should happened to wake up one fine morning and find themselves in the CMR, they'd think they'd died and gone to heaven. The habitat is that much more superior in the Russell Game Range. To me this makes a point that should be very obvious. The stewardship of the permit holders in the CMR since it's inception has been decadent. Elk require a high quality environment for them to prosper and multiply. In fact, the elk have prospered and multiplied to the point that they've extended throughout the area west of the refuge, and we now have elk on our place, 25 miles west of the refuge boundary.

It is a fact that an environment of quality good enough for elk is an environment with excellent quality for other species of game and nongame animals as well. This point cannot be overemphasized. The present level of management has provided an excellent habitat for game animals and many species of nongame animals as well.

The charge that has been made by the national news

media and environmental groups that the men and women who are permit holders on the CMR have abused and overgrazed the range is false. The condition of the range and game habitat is in excellent condition on the CMR.

When I hunted the area in 1981 we had previously experienced two extremely dry years, 1979 and 1980. The whole area was in excellent condition despite this. There was absolutely no overgrazing in the entire area from the bridge to the UL Bend. The irony of this situation was pointed out very clearly when I got home. The first piece of mail that I picked up contained a lengthy article about the extensive overgrazing by the ranchers on the CMR. The man who wrote the article was an outdoor writer from Kalispel who has never set foot on the Russell Game Range. I wrote him a letter and offered personally to take him on a tour of the game range. I received no answer. Unfortunately, most of what has been written about the conditions on the CMR Game Range comes from writers precisely like this one. It is a travesty that ranching men and women have to defend themselves against this type of media tactic. I have hunted this same area ever since 1981. The conditions of the range and game habitat remains in excellent condition.

And in conclusion let me make a few points. Number one: Let's lay to rest all the charges that the ranchers have abused and overgrazed the Russell Game Range. Number

two: Range and game habitats are presently in excellent condition under existing management. Allotment cuts in this situation are absolutely unjustified.

MR. ALDRICH: You have one minute.

MR. KNOX: Number three: There's ample room and ample habitat for both existing livestock and wildlife on the CMR Game Range. Thank you.

MR. ALDRICH: Thank you, Mr. Knox. Georgia Frazier.

MRS. FRAZIER: I represent the Yellowstone Audobon Society, and I really like the wildlife on the refuge. I favor the proposed action of the Fish and Wildlife Service, cutting AUMs by 32.8 percent on the C.M. Russell National Wildlife Refuge. The appellate court has ruled that wildlife has priority in access to the forage resources of the range. The refuge should be managed in a natural way, as much as possible, for a balanced wildlife population, not just for hunted species.

Other wildlife refuges have a boundary fences, and I think the C.M. Russell Refuge should have these as needed to prevent overgrazing and destruction of riparian habitat by livestock that are allowed.

The court has ruled that the refuge is to be run as a wildlife refuge. This should be implemented without further delay.

MR. ALDRICH: Warren Willmore.

MR. WILLMORE: Good evening, folks. I'm Warren Willmore. I live at Roy, Montana. I have lived in the Indian Butte Grazing District, which is part of the CMR Russell, all my life.

The Taylor Grazing law was implemented in 1934. A few points that the Taylor Grazing law does for the west: it stabilized all the ranches in all the west, including the CMR country, so they could definitely proceed and build homes permanently, because before that it was free range and whoever dumped cattle on it and had a long enough rifle got the range and made a permanent basis for the complete west.

The Ninth Circuit Court in California ruled and broke a crack in this Taylor Grazing Act. The CMR don't have to abide by it, so that's where we stand today on the Taylor Grazing. It was mentioned at the start of the meeting by the federal people here and I feel that there's people in here that should know about the Taylor Grazing. In the eastern parts of the country there is no federal land. Now, I had a pretty rough meeting in Roy. I went to town, the fire hall in Roy sits upon land given to the Milwaukee Railroad. The homesteaders got this land for using; the CMR has got that down there for using it. The livestock industry is the only people who have paid for it without a chance to own it and control it. Now, as far as taxes on the federal

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land, there is an amount submitted to the county and governments within a few cents of our number four land that you pay taxes on and there's just a very few cents difference. So cattle that run on that permit and wildlife, the federal land pay their way. If I, for example, lose my Fish and Wildlife rights that I have today, it will cut Fergus County tax income about three to five hundred dollars a year.

And there's a few other points brought up here today. This man right here talked about access to the fish and game range. Now, whether access -- scatter the game out of the range, more people in there, I do not know. That is for you people to make up. So, thank you and we'll see you.

MR. ALDRICH: Thank you, Mr. Willmore. Florence Knoll.

MRS. KNOLL: I'm from Billings, Montana. I support Alternative B, the proposed action, as the alternative best designed to reach and maintain national wildlife refuge management objectives. Alternative B abides by the decision made by the Ninth Circuit Court of Appeals of October 14th, 1983.

This spring I viewed an overgrazed portion of range next to an area fenced off from cattle grazing and noted how very fast overgrazing by livestock can make good grassland unsuitable for wildlife habitat. Alternative B assures

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an average 33 percent reduction from present federally licensed AUMs, along with fencing to keep livestock in authorized areas.

The CMR National Wildlife Refuge is long overdue for a comprehensive plan. The present Draft Environmental Impact Statement, incorporating the proposed action, Alternative B, should be implemented without further delay. Thank you.

MR. ALDRICH: Leonard McKinney.

MR. McKINNEY: My name is Leonard McKinney and I'm an attorney in Lewistown. I've been here for about 22 years. I'm not a native, I'm here by choice because this is a great place to live and raise my family.

As Al McRae said, agriculture is the backbone of Lewistown and it's the backbone of Fergus County; therefore, I think it's essential that someone that lives in town and doesn't really have the basic understanding or the basic problem to come here and tell everyone that we recognize, the people that live in town, that agricultural activity is really our living too. And what's good for agriculture is good for us. If agriculture has bad times, we have bad times.

As I view what's happening here, this could hurt -- maybe it's only a small fraction of the agricultural

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people in Fergus County and the outlying counties, but if it hurts them it hurts us. The range has been here for a long time. It's a quoit system of agriculture. I don't think there's been any major problems. I'm for leaving the status quo so that no one is hurt. Agriculture right now is probably in its lowest depth than it has been for a long time and it certainly can't take anymore whippings.

Therefore, I would go on record as being in favor of maintaining the status quo of the reserve.

MR. ALDRICH: Thank you, Mr. McKinney. George Komarek.

MR. KOMAREK: My name is George Komarek and I live in Roy and Mobridge, Montana. I just made notes, I didn't write out a statement, but I'm here on behalf of myself and also for the Fort Peck Game Range Committee. I'm a director for Fergus County and Petroleum County.

And a year ago, 11 months, a year ago yesterday, we met with Bob Jantzen, the director of the Fish and Wildlife in Washington D.C., and with Bob Bedford, BLM manager at Glasgow, Montana, and we questioned them about -- we flew them all over the CMR Game Range and we asked them what they thought of the grass and the wildlife and they both said they thought there was room for livestock and wildlife. And then they also said, "I think we see more wildlife off the

CMR Game Range than we have seen on." So I don't know why we keep bringing these hearings up all the time and nothing is being done. Two of the top directors, seems like we can't get nothing done with them. We can't get nothing through to the Fish and Wildlife. I mean everything is all right out here. The grass was excellent. And so, that was about it with them.

And so what we need is more stock waterers and less boundary fences and we need more weed control. All we're having down there on the CMR now is knapweed and Canadian thistle. And they have tried to spray some of it after so many complaints right along the state park down there, but they didn't bother about looking at the Canadian thistle that's along the road. So they call that the habitat. They don't want none of that stuff hayed, cut or anything else; but they would prefer it being burnt accidentally, you know, because it is right next to the park down there, the state park, and all we get out of that is mosquitos and bull snakes, and so it's another bad factor about that.

We've always been good neighbors with the Fish and Wildlife and we've always acted in good faith and we don't know why they can't return our favors. There's no sense in cutting this 33 percent. When I started the range down there about '34 there was more livestock down there than there is now, and like I say, we can still get by. What we need is several tons of poisoned oats and three or four hundred pounds of 1080 and that would eliminate an awful lot of these wildlife managers. Just like was mentioned before, good common sense will manage a good ranch, but you can't have preditors and try and raise wildlife at the same time because they kill off the animals as fast as they are born. In 1979 Mr. Calvers flew from --

MR. ALDRICH: You have one minute, Mr. Komarek.

MR. KOMAREK: All right. He flew from Fort Peck to the Robinson Bridge and he found about 42 dead deer that the coyotes had run out on the ice and had killed. So like I mentioned before, all we need is more poisoned oats and some 1080 and good sense. Thank you.

MR. ALDRICH: We have a couple of natives, as far as speaking. Joe Komarek.

MR. KOMAREK: Mr. Chairman, Mr. Secretary, I'm here to represent the Indian Butte State Grazing District. At present, I'm chairman of the district.

And at present, to the best of my knowledge, we lease and pay for all school sections in the Indian Butte School District. The grazing district borders the CMR approximately 25 to 30 miles. I understand all the game outside of migratory fowl belongs to the State of Montana. We have paid approximately $500.00 per school section. I am sure that the state doesn't have one-half enough acres to take care of their game. We support the deer and elk anyway. The ranchers and farmers in this area as taxpayers support the schools and county wages. At present, the deer and elk are ruining our bales before we can get them off the fields.

I want to make this statement to the Federal Fish and Wildlife: They had better take a good look as to where their priorities lay. And to answer you, sir, where were you in the 1930s when the ranchers paid for all the school sections in the BLM? And now you're trying to steal them away from them. You even went up the State of Montana and tried to get the school sections that we leased and I pay for for state land in our district.

MR. PHELPS: Mr. Hearing Examiner, would you give me a rebuttal?

MR. KOMAREK: I'm giving you a rebuttal. Where were you in the '30s when the ranchers and farmers paid for everything, the recreation, the deer hunters, the wildlife, they paid for nothing. What we believe in is a co-existence and what I'm saying is you folks don't believe in co-existence. We lean over backwards and we support more damned game of yours in the Indian Butte Grazing District. It's the biggest grazing district in the State of Montana. There's hundreds and hundreds of elk running on us and deer. We don't try to cut your numbers 30 percent, and why in the hell are you trying to cut us, that's what I would like to know. Do you folks believe in co-existence or not? Do you? You don't. All you think about is getting rid of us and that man over there is trying to steal our school sections.

I'll tell you Mr., at the next legislature I'll be there and I hope you are too when you try to take these school sections away from us. No doubt you are on a federal pay roll. By God, I make it this way. And I'm going to be there when you ain't.

MR. ALDRICH: Thank you, Mr. Komarek. Craig Flentie.

MR. FLENTIE: My name is Craig Flentie and I'm here representing the Lewistown Rod and Gun Club this evening. I don't really have a prepared statement, I do have a few notes. We've had several discussions about this with our membership, which consists of both ranchers and town people. With the assumption that access and hunting and other forms of current recreation remain as they are, we support the Fish and Wildlife Service proposed action. We realize full well that the most critical frustrating point of a program like this when you're talking about reductions in AUMs and economic impact to those people directly affected. You people here are much more familiar with the economics of that than I am. I've glanced over the figures given in the economic section. In an independent survey finished in 1982, which dealt with specific recreation in Montana along with the Missouri River in eastern and southern Montana. In 1982 there were approximately nine thousand one hundred days which direct resulted in $180,000.00 in direct expenditures in various forms of business and individuals in the region. And that money turned over a little over a third of a million dollars spent in the same way, for businesses and individuals in the region. The study went on to show some figures for 1990 which were quite impressive, but as Mr. Houston said, no one knows who's going to be there in 1990.

I would like to commend the staff of CMR for their work on a project like this. It's a big undertaking, representing a lot of different interests and ahead to come is some difficult decisions. Thank you.

MR. ALDRICH: Thank you, Mr. Flentie. We had to cut two people off in the midst of their statements. If Mr. Houston would like to state anything further, please feel free to.

MR. HOUSTON: The U.S. Fish and Wildlife Service, they try to keep these so-called environmental groups thinking that if it weren't for the U.S. Fish and Wildlife there wouldn't be any wild animals left in eastern Montana. The truth is, if they manage it much longer the only game left

will be something too large for a coyote or an eagle to kill.

Folks, we have a government back there at the insane asylum on the Patomac that is crying out of one side of their mouth that we have millions of hungry people -- and maybe there is, I don't know -- and out of the other side of their mouth they have the U.S. Fish and Wildlife advocating having the bushes in eastern Montana full of wild animals all eating one another, plus thousands of acres of prairie dogs that eat everything there is on the ground. And then prairie dog towns could be growing grass and feed for wildlife and domestic livestock. They talk about cutting the livestock on dry years in this EIS as if droughts are the faults of the ranchers. An expedition in the early 1800s couldn't find any water in the Yellowstone River at all until they got up to the mouth of the Little Big Horn. There was no livestock in this country at that time. When I was a boy, an old white man that the Indians had raised told me he had saw it so dry here one year -- and I can't remember the year, my fault -- that he rode from the Missouri River to the Yellowstone before he found enough water for his saddle horse. So this idea of cutting livestock on dry years is just another one of their gimmicks to break the local ranchers, same as they are working on when they raise the grazing fees out of sight. The way the U.S. Fish and Wildlife waste money they sure weren't doing it for economic

help for the government.

On this Corps of the Engineer's land, I talked to Johnny Twitchell last night in Glasgow, and he's about ten years older than me, he's one of the men that they took part of his land away from him on the river; but he still had enough left to stay. Now most of those oldtimers are dead now, they aren't around to tell this or experience this. The Corps of Engineers took their land, same as anybody else, along this river, in spite of what the Fish and Wildlife tries to tell you how glad these guys were to sell off. I knew lots of them on both sides of the river and I never knew one of them that was glad to sell out. But when the water got up their nose they had to go. But anyway, according to Johnny last night, they promised, the Corps of Engineers, when they bought their land, what was going to be out of the water they said we'll lease this back to you ranchers for one-twelfth of one percent of what we paid you for it. Well, it didn't get too bad for a while, but when we had old peanuts for a president he pressured our Corps of Engineers into turning over their land to the U.S. Fish and Wildlife. Immediately they raised the grazing fees out of sight. That land today, he told me, he pays more to run a few cattle on them acres they took away from him. He pays more dollars per year than they paid him for the land in the 1930s. So this is so much again for our government's promises. This

was their high grazing fees.

In their proposed action they put out a bait for the boat people. They promised a boat landing at the mouth of the Fourchette. Well, we don't care how many boat docks there is -- somebody might get some good out of them -- nor where they were. But they can build boat docks as good if we have any other action as easy as in proposed action, but it won't work at Fourchette because it is just a mud flat with only two or three feet of water. Like everything else that takes common sense, everyone knows that except the U.S. Fish and Wildlife. Ever since back in the Indian days our Department of Interior has had the idea that anyone that lives and works close to nature should be either starved or shot or both, and in that order. Since shooting went out of style with the Indians, it looks like they plan on concentrating on the starvation plan. Since the livestock and the game don't interfere with one another, I recommend Alternative A, the no action plan with no mitigating measures except multiple use and absolutely no cuts in livestock and a lot more water development for wildlife and livestock. Thank you.

MR. ALDRICH: Thank you, Mr. Houston. If you would give the stenographer your statement, I would appreciate it.

MR. HOUSTON: It's been a pleasure and I imagine you were tickled pink too.

MR. ALDRICH: I had to cut one other speaker off in mid-sentence too, Mr. Phelps. I would appreciate it, however, if you would use this time not as a rebuttal, but as constructive comments or criticism on the Impact Statement itself. You and Mr. Komarek can debate your differences someplace else.

MR. PHELPS: The first job I had out of high school was cleaning out pens in the stockyards. I knew the first man that managed this refuge. He was Albert Van Pulling in 1938. He really wasn't the manager of the game range, he was sent in here until they could get a manager. And he said that dual management was a farce. He said the BLM shouldn't even be allowed on the place. He said he got along with the ranchers. That dual membership ended in 1974. That was when Roger C.B. Martin -- and I don't know what the impetus was -- tried to do away with three game ranges, one out in Oregon, one down in Arizona and this one. And so when the dust was settled there was a law passed in congress designating management of those three game ranges, of which this is one, to be managed by the Fish and Wildlife Service. And I think maybe if the effort hadn't been made to eliminate the game range and turn it back to the BLM exclusive, maybe you would still have dual membership.

I remember working in that stockyards.. The beef price in 1933 was a lot lower than it is now. I think they sold sheep for about four bucks a head. And so it's all relative if gasoline is going to be a dollar a gallon, I suppose prices ought to change.

There's been a lot of name calling around here and I think this is a two-way street. If you want to cooperate with the Fish and Wildlife Service you've got to understand their mandate too, they're operating under certain laws. If you don't like the way they're doing, you can go higher. Mr. Fries is the manager over here and if I disagreed with him one hundred percent I wouldn't try to get him removed, because he's trying to do his job. They ran Larry Calvert out of here, and there was a refuge manager ran out in Oregon because he got on the wrong side of a rancher who was the brother-in-law of the senator from the neighboring state. The refuge manager in New Jersey was run out because they posed a housing development right up next to the refuge. Game and livestock get along a lot better together than game and housing development, I can tell you that. And on the Mississippi River there was a refuge manager that was run out because he opposed a power line. I've got to admit that's not germane to the Impact Statement, but I do want to say that there are conflicts. The EIS dramatizes those conflicts. There's going to be more conflicts as the world gets more population and we've got to work together.

Now, there is one rancher who spoke tonight who has a small operation and cuts on his grazing would be quite severe and we know that -- or I know that -- and that's why I recommended that the five-year period be flexible. Where are you, Shorty? I think you cut about 45 head out of your 125. Anyway, that's a pretty severe cut, so these things can be adjusted.

So where was I in 1934 when the Taylor Grazing Act was put into effect? I was writing letters to have it put into effect. That's how old I am. Thank you.

MR. ALDRICH: Thank you, Mr. Phelps. Is there anybody who is in attendance here tonight that didn't register to speak who would like to speak?

3 UNIDENTIFIED: I'd like to ask just one question here. You're pushing that fencing pretty strong, are you going to build a good enough fence so you can keep your stock in and ours out, or just so ours can't get in and yours can't get out? I had a neighbor one time that built a fence like that. He said it wasn't built to keep someone's cattle out, just to keep his in.

MR. ALDRICH: If you'd like to have questions for Mr. Fries and Mr. Schranck, I'd appreciate if you could do that at another time and place. The reason we are here is to take comments on the Environmental Impact Statement.

If there is nothing further at this time, I will again repeat that the Fish and Wildlife appreciates your comments and we'll consider all of the comments that have been made this evening in making their decision and publishing a final Environmental Impact Statement and then in implementing the decisions after publication of that Impact Statement.

If you have further comments or if you wish to make further written statements please feel free to do so. I will repeat for you again those addresses, if I can find them. Send them to Galen Buterbeaugh, the regional director for the Fish and Wildlife Service, Box 25486, Denver Federal Center, Denver, Colorado, 80225 or to Ralph Fries, the refuge manager, Charles M. Russell National Wildlife Refuge, Box 110, Lewistown, Montana, 59457.

MR. HARRIS: I just would like to ask a question to clarify something in my own mind. If I understood right, Mr. Phelps was with the Federation of Wildlife?

MR. PHELPS: No, I testified for myself.

MR. HARRIS: Well, I guess what I don't understand is in what capacity do you refer to yourself and the Fish and Wildlife as we?

MR. PHELPS: Well, if I did it was a slip. I'm not employed by them and never have been.

MR. ALDRICH: If there is nothing further this evening I will declare the hearing closed. As I say, a verbatim transcript of the hearing will be included in the hearing record for referral to the director of the Fish and Wildlife Service in his decision making process. Thank you very much for attending and I hope that you all have a good trip back home.

The following statements were submitted, but not read orally at the public hearing:

MR. ISAACS: Concerning the Draft Environmental Impact Statement, the new DEIS appears to have changed little from the first. There has been no on the ground study of my allotment (37), that has been done to my knowledge, since the original study. A water spring has been developed on the south end of the allotment. Also a spring on the east side allotment about half mile from CMR. In both studies the lack of water or distance between watering places was part of the reason for a livestock number cut. I have checked with local refuge employees repeatedly and find they think as I do that my allotment is in very good condition. From the day the Fish and Wildlife took over the game range I have been shorted ten AUMs. The management have knowledge of this, but they still have not been reinstated, yet they are

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proposing to cut a large number of AUM from this allotment. In the last few years there has been many signs of various size, posts (many roads on access for fishing and hunting closed). Since FWS took over there is more sign of site pollution than in anytime previous. In the same allotment there are plots fenced amounting up to ten acres or less in site along roads of easy access. The rate dollar amount charged for grazing (1 cow for 1 month). AUM is excessive under their conditions ruled by policy of CMR manager. Because of late or timed turnout dates, restricted travel, having to renew and rebuild allotment fences. Feed salt, handle or gather livestock, lack of water in some places, the loss of revenue in grossly under estimated if AUM cuts are enforced. My allotment is used primarily for winter grazing, leaving all grass and shrubs for the wildlife, yet there is very few deer or antelope there in summer. They graze the fields, alfalfa and flood dikes and are drinking from the wells around building. The DEIS is another eventual lockup of a large partial of land that is needed for the economy of Garfield County and our Agriculture. The revised DEIS is not a true or accurate study. There should be no livestock cuts, and no mitigating measures with mitigating measures as in the DEIS. The Fish and Wildlife can run it any way they please as if by dictatorship. The DEIS should not be passed. The multiple use action proposed is the nearest

to being fair.

MR. LELEK: I have been in business in Fergus County for the past 30 years plus, and strongly favor the grazing program as set up under the Taylor Grazing Act.

The need for human food far surpasses the need for recreation.

The fragile economy in Fergus County would be further eroded, if livestock grazing were decreased, as your purpose. Please stop biting the hand that feeds YOU.

* * * * * * * *

Responses to Testimony Presented at the Lewistown Public Hearing, August 1, 1984

1. **Response to Ernest Zahn (page 8)--Grazing fees are not a part of an EIS. Please contact Refuge personnel.**

2. **Response to James Phelps (page 14)--Subleasing is prohibited by policy of the National Wildlife Refuge System. This item will be addressed once the EIS is approved.**

3. **Response to Unidentified Comment (page 45)--Fences would be built to keep livestock in the proper pasture.**

4. **Response to Mr. Isaacs (page 48)--There was always some water available at the site of the spring on CMR. The spring development only increased the availability of the water--it did not create any more AUMs of vegetation.**

If you have problems with your current number of AUMs you should contact the staff person responsible for your allotment.

THE UNITED STATES FISH AND WILDLIFE SERVICE

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TRANSCRIPT OF PROCEEDINGS

FOR THE CHARLES M. RUSSELL NATIONAL WILDLIFE REFUGE

- -

PUBLIC HEARING

Taken at Village Red Lion Inn
Missoula, Montana
Thursday, August 2, 1984

Reported by Melody Jeffries, RPR, Official-Freelance Court Reporter for the State of Montana, residing in Missoula, Montana.

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THURSDAY, AUGUST 2, 1984

HEARINGS OFFICER: I think we'll try to begin. I'm sure most of you people are familiar with these proceedings and that if someone comes in late, they can still be included.

Ladies and gentlemen, my name is Roger Thomas. If you all want to take a seat, I'll try to get started. I'm an attorney in the Office of the Solicitor of the United States Department of Interior, located in Billings, Montana, and I've been designated the hearing officer. If you folks would like to register at the back, if anybody hasn't. I've been designated the hearing officer by the Fish and Wildlife Service to preside over this public hearing.

The purpose of the hearing is to receive comment, written and oral, from the general public on the recently completed Draft Environmental Impact Statement, sometimes referred to as a DEIS, which addresses alternative proposals for management of the Charles M. Russell National Wildlife Refuge in Montana.

On March 21, 1984, the Fish and Wildlife Service gave notice that the public -- advising the public that they could make comment. They did so by publishing a notice in the Federal Register.

That notice in summary form and the Environmental Impact Statement in complete form summarize the proposed management actions and the major alternatives being considered,

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analyzed and evaluated. We have a limited number of copies of the DEIS here tonight, about five. I'm sure most of you have seen them, but here's what it looks like. You're certainly welcome to come up and take one, look it over, read it.

You might have noticed that we're making a recording of these proceedings. This gal here over on my right with something that looks like a typewriter is taking down the words that are going to be said. A transcript of that recording will be included in the official record of this hearing, which will be forwarded to the Director of the Fish and Wildlife Service for use in preparation of the final Environmental Impact Statement.

Again, I'm sure some of you folks are familiar with these proceedings, but I would like to take a minute of your time to announce some basic rules that will govern our proceeding.

As you recall, when you entered the meeting room you filled out an attendance card -- it looks like this -- and on that attendance card we ask you not only for your name and address, but whether you wish to make a statement. If you wish to make a statement and have indicated otherwise here, please let us know before the end of the proceeding.

At the end of the proceeding, I will give anyone an opportunity who has not supplied us with one of these to come forward so that they can make a statement. These are first come first served. There's no particular order. The first person that came in will be able to speak first.

The purpose of this hearing is to receive comments. It's to have input from the public. It's not an adversary proceeding. It's not a question and answer assembly. It is more in the nature of an advisory hearing. It's being provided to give you an opportunity to submit your comments, either written or oral.

Now, without being too strict, we have set a five-minute guideline or limit on oral comments. If your comments exceed that time, we're asking that you submit them in writing and try to highlight them orally. The purpose of this is to provide everyone an equal and fair opportunity to make their position known.

We've had three hearings set up. There was a notice also of those three hearings, which was published on July 11, 1984, in the Federal Register. Two nights ago we held one in Glasgow, last night in Lewistown and tonight, of course, in Missoula.

Now, if you have written comments that you want to submit following the hearing, the deadline for those written comments is August 15, 1984. The Interior and the Fish and Wildlife Service will welcome those comments and duly consider them. They are to be submitted to the Denver office. The address is on the inside first page of the DEIS, which is the

Regional Director of the United States Fish and Wildlife Service, P.O. Box 25486, Denver Federal Center, Denver, Colorado, 80225. If you want to get that afterwards, I'll be happy to provide it.

There are some officials of the Fish and Wildlife Service here tonight and I would like to introduce them. Ralph Fries was unable to be here tonight. He is the Charles M. Russell Refuge Manager out of Lewistown. Larry Malone on my left here is the Assistant Refuge Manager, also out of Lewistown. Receiving you folks at the door was Sue Wightman and Kathy Van der Hagen, both employees at the refuge, out of Lewistown.

I've asked an official of the Fish and Wildlife Service to give a brief statement on some of the issues in the EIS or the DEIS, and so now, I'll have Mr. Malone come forward and give his brief statement.

MR. MALONE: Good evening. I'm going to be making a brief statement here and I'm going to read it. It is a written statement and it is for the record, also.

The Charles M. Russell National Wildlife Refuge was established in 1936 as the Ft. Peck Game Range. The game range was administered jointly by the Fish and Wildlife Service and the Bureau of Land Management. This resulted in continual conflicts for 40 years as the two agencies have different goals.

For a short period in 1975 and early 1976, the area

was managed solely by the BLM. But on February 27, 1976, the U.S. Congress passed Public Law 94-223, giving sole responsibility for the management of the area to the Fish and Wildlife Service and changing its status from range to refuge.

When the Fish and Wildlife Service accepted responsibility for the management in 1976, it also accepted a part of a pending lawsuit that required an Environmental Impact Statement, commonly referred to as EIS, be prepared.

A special team was assembled and over a three-year period, a Draft EIS was prepared. Public hearings were held on that Draft EIS in 1980. However, a court suit delayed the issuance of a final EIS.

On January 14, 1982, U.S. District Court in Billings, Montana, ruled, "We have decided that the ranchers are entitled to have grazing declared a co-equal priority with wildlife conservation. Thus we must conclude that CMR must still be administered under the Taylor Grazing Act."

However, the District Court's decision was appealed to the United States Ninth Circuit Court of Appeals. On October 14, 1983, the Appellate Court overturned the District Court ruling that: "One: Wildlife has priority in access to the forage resources on the range up to the limits specified in Executive Order 7509.

Beyond those limits, wildlife and livestock have equal priority in access to the resources of the range: and, three,

the range is to be administered under the Wildlife Refuge Act."

The Wildlife Refuge Act refers to the National Wildlife Refuge System Administration Act of 1966.

Thus, it is clear that wildlife has priority on the refuge and that the Taylor Grazing Act provides no rules or regulations pertaining to refuge operations.

Due to a delay of several years, the Fish and Wildlife Service decided to issue a revised Draft EIS. The public input received through earlier public review had been considered in preparing this Draft EIS. The meeting tonight concerns this revised Draft EIS.

The refuge goals and the wildlife, range and recreational objectives are listed on pages 4 through 6. Five alternatives are analyzed in the Draft EIS.

The most controversial part of the EIS is the grazing program. The five alternatives analyze the grazing program from a "no change" to total elimination of grazing, with three alternatives between these two extremes.

The Fish and Wildlife Service is not opposed to grazing on the refuge. In fact, in the proposed Fish and Wildlife Service alternative, it is proposed that we graze about 40,000 AUMs per year. At present there are about 60,000 AUMs authorized for grazing.

Also, from comments received on the first Draft EIS, it was apparent that many persons confused range condition and wildlife habitat condition. It should be remembered that these two items are not the same.

Please remember the deadline for any written comments is August 15, 1984. Thank you.

HEARINGS OFFICER: Thank you, Larry. We're just about ready to begin. There's a couple more things I might mention. I will first announce two speakers. The first person I announce will be the first speaker, and the second will be, as I'll call it, on deck. There is a chair I've put over here if you want to come forward and be ready to speak. That way we can move in an orderly manner through the hearing.

Secondly, for your convenience, there is restrooms down by the cashier. Our first speaker is Hank Fischer. The second person on deck would be Robert Ballou. If Robert would come up and have a chair over here.

MR. FISCHER: Thank you. My name is Hank Fischer. I'm the Northern Rockies field representative for Defenders of Wildlife. We've been closely involved with the management of the C. M. Russell National Wildlife Refuge for nearly 10 years, and I've personally been involved for the past seven years. I've served as Defenders of Wildlife's field representative.

I've been on the refuge numerous times. I've toured it, oh, I suppose six, eight different times and have spent a great deal of time looking at the various allotments and have a had a chance to view many of the problem areas on a first-hand

basis.

Defenders of Wildlife feels that the C. M. Russell National Wildlife Refuge is one of the most prestigious national wildlife refuges in the country of a regular use system. It's the second largest wildlife refuge in the country and contains one of the most abundant and diverse wildlife populations found anywhere.

Because the CMR is such an important refuge, the management direction is important from a national basis because decisions made on the CMR will affect the entire refuge system nationwide because it's going to affect the grazing pattern nationwide.

Without a doubt, the most critical issue on the C. M. Russell National Wildlife Refuge involves what constitutes acceptable grazing levels. The recent Appellate Court decision has made it clear that wildlife has priority on the refuge, and that means changes are in order.

Right now on the refuge, livestock are allocated 62 percent of the forage, while wildlife receives only 38 percent. I would like to emphasize that changes in the grazing regimen don't mean that the entire refuge is overgrazed and mismanaged.

To the contrary, many allotments are in good condition and wildlife populations are thriving. But the Fish and Wildlife Service's Environmental Impact Statement makes it plain that many problem areas still exist and that we need to

address these problem areas aggressively.

The EIS makes it clear that wildlife habitat on the refuge is only in fair condition, that present deficiencies include lack of residual cover on upland sites, lack of cover around ponds and in hardwood draws, poor quality and quantity of deciduous shrubs, and a lack of vegetation along hardwood draws and in stream courses, poor quality sagebrush stands and insufficient timber densities.

The EIS freely acknowledges that riparian areas, undoubtedly the most productive and most important habitat, are in poor condition, and, in fact, are considered sacrifice areas because of the livestock concentrations. Clearly, the present situation does not provide a national wildlife refuge situation. In fact, the EIS makes a strong case that livestock numbers should be reduced on the CMR.

Given these conclusions, one might expect to find a reasonable range of alternatives dealing with how livestock reductions might take place, but this is one of the major shortcomings of the EIS: there aren't realistic alternatives.

Alternative A, for example, the no action alternative, is clearly unacceptable given the Fish and Wildlife Service conclusion that the current management does not provide a national wildlife refuge situation.

Alternative B, the proposed alternative, looks at one scenario for reducing grazing, and it's a good solution, but

it's the only one.

Alternative C, the intensive wildlife management, runs directly counter to the Fish and Wildlife Service's stated mission for the CMR, which involves managing in a generally natural setting the CMR's wildlife. It would have been much more reasonable to design an intensive wildlife alternative with those kind of constraints in mind.

Alternative D, the no grazing alternative, does not seem reasonable either, given the congressional and court directive to continue grazing.

I don't want to get into the other potentials for alternatives. I'll get into those in my written statement, but I just want to make clear the fact that we only have one acceptable alternative for reducing grazing is a significant flaw in the EIS.

Just a couple quick points. Defenders of Wildlife supports Fish and Wildlife's plans to reintroduce species like bighorn sheep, peregrine falcons, ferrets and swift foxes. These kinds of positive wildlife efforts are exactly what wildlife refuges were meant to do.

We concur that prairie dog control is not appropriate on the national wildlife refuge, except in extraordinary cases involving human health and safety.

We agree that cooperative farming and haying should be phased out in the bottoms along the Missouri River and natural river bottoms restored. Thank you for the opportunity to comment. One final point I would like to make is when Congress gave the Fish and Wildlife Service fuel management authority for the refuge back in 1976, it was done with the understanding that the conditions would improve for wildlife. With adoption of the proposed alternative of this Draft Environmental Impact Statement, we can finally start to make some of those long-awaited changes on the wildlife refuge. Thank you.

HEARINGS OFFICER: Thank you. After Robert is Tom France. If you would come up, Tom.

MR. BALLOU: Mr. Hearings Officer, my name is Robert Ballou. I've been eminently associated with CMR for a number of years. I am submitting a written statement for the Montana Audubon Council in support of Alternative B, the proposed action of the DEIS.

In support of that statement, I would like to comment briefly on the far too many delays or roadblocks, if you will, that have been devised to stall management for wildlife on CMR. In February 1976, eight and a half years ago, the Congress clearly and overwhelmingly placed sole management of CMR under the Fish and Wildlife Service to be managed as a national wildlife refuge.

However, in compliance with a court decision in connection with a suit filed by the National Resources defense counsel, a Draft Environmental Impact Statement for the

management of CMR was published and distributed in August 1980.

The first serious delay was allowed to occur as a result of court action: *Schwenke, et al., versus the Secretary of the Interior, et al.*, in which Federal District Court Judge Batton in Billings reached an incomprehensible decision that CMR must be managed under the Taylor Grazing Act, with livestock grazing having equal priority with wildlife on a national wildlife refuge, believe it or not.

Based on this, the Reagan Administration decided that management of CMR would be placed in a holding pattern while this decision was appealed.

Independently, the Department of the Interior only very reluctantly joined in on the appeal of this incredible decision. The Ninth Circuit Court finally overturned Batton's amazing decision in October of 1983, reaffirming that CMR is, indeed, a national wildlife refuge, to be managed primarily for wildlife, specified in Executive Order 7509 and under the Wildlife Refuge's System Administration Act.

This has been the intent of the Fish and Wildlife since 1976 and is the thrust of the Draft Environmental Impact Statement. Still the management is frozen at CMR. An executive decision is made to prepare yet a second Draft Environmental Impact Statement. This draft is a literary improvement over the earlier version, but it says virtually the same thing. Nothing of real substance has changed.

However, eight months dragged by, the period for comment on this DEIS has been extended from June until August 15th, I guess, on the request of Mr. Marlenee: a delay of yet another two or three months. Now we are holding a second round of hearings on the same material, on very short, meager notice, I might add. I expect that's one reason why there isn't greater attendance here. This permits another month of stalling.

Mr. Hearings Officer, as I said before, it has been eight and a half years since Congress has made it quite clear what should be done on CMR. Some delays were inevitable, but many were unwarranted. Being an election year does not justify further delay. Those landowners having grazing privileges, not grazing rights, on CMR does not justify further delay. Political maneuvering on the part of politicians supported by these livestock operators does not justify further delays. And stalling tactics by an administration lukewarm on environmental issues does not justify further delays. Let's get on with the proper management of CMR for wildlife, as Congress and the courts have directed. Thank you.

HEARINGS OFFICER: Thank you. After Tom France is Leo Joron.

MR. FRANCE: Thank you very much. My name is Thomas France. I'm an attorney with the National Wildlife Federation. I was the attorney of record in the Schwenke litigation against

the Department of Interior over the CMR grazing EIS and the management direction on the refuge, and I participated in both the District and Ninth Circuit decisions. It is certainly with pleasure that the National Wildlife Federation now stands and endorses the preferred alternative that's proposed in the Charles M. Russell Draft EIS.

As Mr. Ballou said, I think it's long overdue that we see some progressive management changes on CMR. It's been mandated by Congress since 1976, it's been mandated by the courts last year, and I think it's about time that we saw some changes on the ground and we saw the wildlife resource on CMR finally get a chance.

To open my remarks, I'm going to read a letter from a dentist in Roundup, Montana, and I quote, "Through personal inspection of the air and from information obtained through private but reliable sources, certain livestock interests have been quietly but effectively taking over the game range lands and forest resources which should be left for wildlife. Each year more grazing allotments are issued and being fenced in in support of a resolution by the Association of Western Game Commissioners condemning the construction of fences on game ranges. Each year more and more livestock is permitted to graze the area during the winter months when such stocks should be bound to private holdings, and that land should be preserved as winter feed for wildlife. Are the interests of hunters and fishermen going to be jeopardized for the benefits of a preferred few? Are all the proposals that have been made surrounding CMR to be ignored?"

Now this letter is dated August 16th, which some of you might feel makes it a little late for the comments that are due on August 15th. The only thing is that this letter is also dated 1952, and I think that this gives you an indication of how long we've been trying to solve the problems that exist on CMR.

30 years later we still have conflicts between wildlife and lifestock. 30 years later we're still seeing conservationists and landowners battling it out, and I think that the time has finally come to recognize that CMR was established in 1936 as a wildlife game range, that its first priority now by court order is for wildlife and that it's time that we see some land changes on the ground.

In this regard, the National Wildlife Federation strongly supports the preferred alternative. While we feel that the intensive wildlife management alternative has -- can be spoken in favor of, our preference certainly is for the alternative outlined by the Fish and Wildlife Service, and particularly we find the nature of the intensive wildlife management inappropriate for a refuge such as CMR and that the natural orientation of management described in the preferred alternative is a far better course of action in the harsh lands

of the Northern Great Plains. We question how much money is going to be available over time in these difficult times of budget constraints insofar as financing is concerned.

For these reasons, we support the preferred alternative. We feel that the grazing reductions outlined therein should be phased in, but we also would urge the Fish and Wildlife Service to carefully monitor grazing conditions on the refuge and where appropriate, allow additional livestock, but only where it does not cut into wildlife objectives. We think this is the mandate of the court language. We think that this is the mandate of the original executive order establishing CMR.

I would like to say a few words, too, about the multiple usage alternative described in the Draft EIS. That alternative essentially describes a 50/50 split between wildlife and livestock.

As Mr. Fischer suggested, right now 62 percent of the range is dedicated to livestock with 38 percent being utilized by wildlife. Under the multiple use, we would see a 50/50 split on the AUMs.

One of the points that has been missed in the Honorable Judge Batton's decision, the district court decision which upheld the ranchers' contention on CMR, was that Judge Batton held, basically, that what the original executive order allowed on CMR was a 50/50 split. It was this order that was

expressly overturned by the Ninth Circuit when they found that wildlife had priority. So if one wants to read the court orders, there's no question but that we've already considered a 50/50 livestock wildlife allocation and that it's been found wanting under the executive order drafted by Franklin Roosevelt 50 years ago and reaffirmed by Congress in 1976, and now we're about to see some changes that have long been promised and are long overdue. Thank you very much.

HEARINGS OFFICER: After Leo is John Langen.

MR. JORON: Mr. Hearing officer, my name is Leo Joron. I live in Missoula. I'm not representing anybody other than myself. I would just like to go on record as being in favor of the Fish and Wildlife Service's 33 percent grazing reduction alternative. I think that's a strong first step that is necessary in managing the CMR. And I think that 38 percent allocation for wildlife on a refuge is rather ridiculous and 62 percent for livestock is out of balance. Thank you.

HEARINGS OFFICER: Thank you. After John is Glenn Miller.

MR. LANGEN: Well, I feel kind of crippled because you're not here to change a tune. My name is John Langen. I live in Glasgow. I'm here speaking both on my own behalf and, because he hasn't able to attend, that of my father, Leonard Langen.

My grandfather was a sheep rancher down on the CMR

before it was the CMR -- before the Taylor Grazing Act. My family has been associated and in the ranching business for nearly three-quarters of a century.

I have a cabin at the Pines. I've been a member of Ft. Peck Forward Steering Committee since it began in 1977. For most of my adult life, I've hunted in and around the CMR. I have a boat and I spend a lot of time on the lake.

I've been out on the CMR as much as any of the people that have spoken so far, probably a lot more. My qualifications to give an opinion is pretty much the same as some of the other people that you will hear from our area tonight and that is that we consider ourselves part of the environment out there. I live there, I work there, I play there, I raise my family there. That's my future. That's my home.

And as part of the environment, I would like to appeal to the Fish and Wildlife Service to give consideration to the people that live there, as well as to the animals and to the birds on CMR. You know, there are a lot of things about this action that's proposed by the Fish and Wildlife that scare the hell out of me. I'm scared that the cabin sites at the Pines will be closed out. I'm scared that road access and boat launching facilities around the Ft. Peck Lake will be curtailed or further reduced when they should be increased, but the thing that scares me the most is the recommendation to reduce the grazing.

To me, the livestock rancher is as much a part of the environment and the history in that area as are the antelope and the deer.

I think that the Fish and Wildlife Service should give consideration to the rest of the environment. All of Valley County, in fact all of the counties around Ft. Peck have an interest in seeing that the livestock rancher on the Charles M. Russell Game Range survives.

This range embraces a good bit of the south half of Valley County, south of the Milk River, and their mandate now is they're going to cut the livestock numbers by as much as one-third. A cut of that magnitude for many of the ranchers is simply an order that will drive them out of business for good.

Certainly it's going to have an effect on our tax base, it's going to have an effect on the merchants in Valley County, it's going to have an effect on everybody that lives there.

I've mentioned that our family has been associated with the ranching business for nearly 75 years. Any one of the ranchers that's going to talk here tonight will tell you, for as long as they've been in Valley County, they've always had to fight economic conditions, low prices and the weather -- particularly this year, the weather. Right now we're in a terrible battle so far as the livestock industry is concerned in connection with both of these adversaries: namely, economic

conditions and the weather.

Do you know what hay costs this year? $115, $110 a ton. I was discussing this year's drought with my father. He lived through the drought in the 30's, and in his recollection, this particular year is as severe as any year he can remember in the 30's. This year the weather is creating a terrible hardship on the livestock rancher. When you couple that with the hard economic times, it's going to make it almost impossible for any of the ranchers to survive anyway, but it seems as though these difficulties are not enough.

Now we have a bureaucratic agency, the Fish and Wildlife Service, who comes in as a third adversary. An adversary who recommends cutting the grazing by one-third. It seems to me that's going too far at this time.

The livestock rancher is going to have to cut his numbers anyway because of the poor range conditions, because of the weather, because of the poor economic conditions. Additional cuts in numbers by the Fish and Wildlife Service adds insult to injury.

I'm out on the CMR a lot. As far as the game animals are concerned, it's my feeling that we have more game, more deer, more antelope, more birds out there now than we've had for years. My father is of the same opinion and his recollection goes back almost 70 years.

I don't think the animals out there are suffering one

damn bit. They certainly aren't suffering by the improved water and range conditions promulgated by the livestock ranchers. The people in northeast Montana don't need another adversary. Things are tough enough as they are.

And people in that area aren't against protecting the environment for the benefit of the Fish and Wildlife on CMR. What we're against is the single-minded approach of Fish and Wildlife which promotes this goal to the exclusion of everything else.

Present management practices and the multiple use concept present a more reasonable approach. The action proposed by the Fish and Wildlife Service, I believe, is manifestly unfair. Thank you.

HEARINGS OFFICER: Thank you. After Glenn is Linda Madson.

MR. MILLER: My name is Glenn Miller. I'm Executive Vice-President for the Glasgow Chamber of Commerce and Agriculture. That group is an active and vocal supporter of the concept of multiple use for federal lands and to this end we support that C. M. Russell Wildlife Range be managed in such a fashion. The Draft Environmental Impact Statement of this multiple use is one such alternative. Other plans listed, we feel, would be detrimental to our area and to our citizens. We believe that if these plans are implemented, they would not produce significant benefits for the citizens of our nation.

Until implementation of any regulated plan, we support a no action alternative. Present management has allowed livestock and game to coexist, producing an abundance of native wildlife. A proposal of one-third cut in livestock grazing numbers will certainly represent a major financial loss to the area ranchers, businessmen and the school tax base.

Also, a statement of the Draft Environmental Impact Statement says no new cabin sites would be allowed, and if, in the eyes of management, there is future conflict with wildlife, the present cottage owners may very well be required to move. This certainly represents a terrible unfair burden upon those folks who believed their federal leases were secure from arbitrary eviction.

In conclusion, we believe such a small amount now being used by our citizens on the million acre CMR Wildlife Range is not detrimental to wildlife or hinders the effective management by the Fish and Wildlife Service of the game preserve.

We respectfully submit our recommendations for the Department to adopt the multiple use alternative and to continue to allow the taxpayers access to this vast land. Thank you.

HEARINGS OFFICER: After Linda is Byron Weber.

MRS. MADSON: I'm Linda Madson, KLTZ-KLAN radio in Glasgow. I'm representing the Ft. Peck Cabin Owners'

Association. I have a cabin at Ft. Peck Lake and I've also been on the Steering Committee of Ft. Peck Forward since it was established. We are a rural based economy in eastern Montana. Most of us living there are decendents of the hardy pioneers that settled and had a great deal of difficulty in making a living from that land, but we chose to stay. We love our eastern Montana area and we choose to stay there.

We have very little by way of recreational development in our community. The Ft. Peck Lake has traditionally been underdeveloped. We have very little recreational access, very few cabin sites. We have a lake with over 1500 miles of shoreline and on the CMR I believe there are about 110 cabin sites. Well, you can see this constitutes a very small fraction of the land. A million acres on the CMR and 1500 hundred miles of shoreline on Ft. Peck Lake, with about 110 cabin sites in the Hell Creek, and Ft. Peck area has a very small percentage devoted to recreational use.

Some of the speakers of the Department of Fish and Wildlife have talked about reintroducing species native to the CMR. I submit that the buffalo was also native to this country and perhaps should be reinstated. I think that would create much more impact than the cattle that the ranchers have on the CMR now constitute.

By its very remote necessities and inaccessibility now and by the very low population figures in eastern Montana, the

CMR is a natural refuge. It's never going to be developed. It's never going to have hoards of people.

I would submit that we do not need artificial restrictions imposed. We have been traditionally -- the ranchers, the farmers and the people of our rural based economy -- have traditionally been good stewards of the land. We do want to protect our environment, to foster wildlife in that area.

I submit that we would like to continue the present management of the refuge, the multiple use concept for the CMR, and please remember the people in eastern Montana who are dependent upon our rural based economy, the farmers and ranchers, and that tax base we gave up. Many of the farmers and ranchers in eastern Montana gave up a great deal of land when the Ft. Peck project was built. Took a big healthy chunk of our tax base at that time and we just can't afford to lose any more ground. Thank you.

HEARINGS OFFICER: I should apologise if I mispronounce anybody's name. After Byron Weber is Gladys Siek.

MRS. SILK: Silk.

HEARINGS OFFICER: Silk.

MR. WEBER: My name is Byron Weber. I'm president of the Five Valleys Audubon here and I live on a sheep and cattle ranch south of Lolo.

I'm pleased to see the folks from Glasgow here. I was in your neck of the woods last week seeing family members in

Scobey and Flaxville, and I flew in a private plane north of Poplar and I know what the drought is like there, so my heart is out to you.

George Catlin, the famous frontier painter and author who traveled throughout the west from 1832 to 1839, wrote the following when referring to the vast plains: "Such of Nature's works are always worthy of preservation and protection; and the further we become separated from that pristine wildness and beauty, the more pleasure does the mind of enlightened men feel in recurring to those scenes, when we can have them preserved for his eyes and his mind to dwell upon." Now, George Catlin passed through the area in hand, so he knew what the prairie was like.

What George Catlin wrote over 150 years ago is precisely what we, the people of Montana, are fighting for: The very guts of our state. The reason why Montana is Montana is because of the values contained within the natural areas such as the CMR Wildlife Refuge.

The very words "wildlife refuge" should indicate the seriousness of the situation. The area is designed for wildlife because it is a last refuge. The more we denigrate the confines of the refuge for nonwildlife purposes, the more we lose our most precious resource: The wildlife and natural areas of the states. Another loss of habitat here, some over there, and soon, bit by bit over the decades, we rip apart our

very heritage. What made Montana Montana has suddenly disappeared.

The Great Plains of yesteryear in the United States have been compared with the Savannahs of present day Africa. Today people travel from all parts of the world to see the animals there. The CMR Wildlife Refuge is a last vestige of the Great Plains and offers the same potential as the Savannah. People spend millions of dollars to soak their senses with the wildlife and wildlands in the state. This is currently the most popular use of the CMR Refuge, and there is no reason to believe that this priority will not continue.

This relates with the overall economics of the area, as well as the rest of the state. The EIS summary states that grazing and haying contribute only -- and I'm quoting -- "Slightly to the regional economy, characterized by slow economic growth."

The $277,000 for grazing fees in 1984 is in-state money paid to the federal government. Money generated by viewing and camping on the refuge is money spent within the local economy. By increasing grazing areas and animal unit months, we increase the money paid to the federal government and decrease the viewing areas which generate the money in the local economies.

The problem is a matter of scale. Maintaining wild areas is a slow process, the economics of which is difficult to measure over a short period of time.

Increasing the grazing, however, will produce instant measurable results in revenue from leases and cattle sales. But as any investor knows, short-term gains can prevent long-term economic stability.

If we are looking for quick dollars, then I would suggest we enhance the image of the refuge by promoting its viewing qualities to potential visitors. Only 20 percent of the visitors to the refuge travel over 150 miles, yet a dollar spent by a tourist may change hands a dozen times within the community where it was spent.

Now, this information I got from a study done here in Missoula, so we can water that down somewhat because the population is different there, I realize that. But a tourist dollar -- and it's in-state tourist as well as out-of-state tourist -- spent in a community exchanges hands among the locals in Missoula, I believe it's fourteen times -- and I might be wrong on that -- before it eventually leaves the community. Tourism would add more quick dollars to the immediate area than increased grazing permits and it would benefit more people in the process.

That people are willing to pay large sums of money to visit the state and view the wildlife can best be demonstrated by the sale of out-of-state hunting licenses. One Fish and Wildlife official said that even though licenses are more expensive every year for out-of-staters, permits are sold at an earlier date every year.

Promoting wildlife is promoting a clean industry with long-term economic benefits. This is not a question of growth versus no growth or development versus no development. This is a decision which affects the lives of all Montanans. Sometime we must put the skids to the trend of diminishing wildlife habitat and if not now, when? The pressure will continue as long as we fail to recognize the economical value of preservation.

The CMR Refuge is a quality product in need of repair. The proposed action alternative seems to offer the most rational approach towards the economics and the natural history of the area. I urge this to be given serious consideration. Thank you.

HEARINGS OFFICER: Thank you. After Gladys is Marlyn Orahood.

MRS. SILK: I am Gladys Silk. I represent the Glasgow Courier, the county's newspaper since 1913. We appreciate this opportunity to testify on the various alternatives on the management of the Charles M. Russell outlined in the Draft Environmental Impact Statement. It was almost a half a century ago, to be exact January of 1936, when the Glasgow Courier became uneasy of the Ft. Peck area. The Ft. Peck Dam was 27 months into construction and the end of that phase of the project was in sight.

The Courier laid out some questions to its readers: What about three or four years from now? On what will the territory fall back? What development, what new populations will take the place of a substantial group of our population whose lands are covered by water?" County records will show that residents whose lands were inundated by the Ft. Peck Reservoir had been paying their taxes when many of those on dry land could not come up with with the money in the depression years.

Historians have said that Ft. Peck should stand as a monument to a handful of ranchers, who, although reluctant, gave up their productive acres in the Missouri River bottomlands to help the nation in distress. That came out of Montana, The Magazine of Western History, summer of '77. The counties affected by Ft. Peck Lake and straddled by CMR now lost forever 669,800 acres of privately owned tax base to the Ft. Peck project.

We were told that irrigation from Ft. Peck would make these dry lands [illegible]en of Eden, making up for the lost lush acres, but it never happened.

Now, almost 50 years later, we're back to square one. We're asking what development, what new population will provide the lost dollars going down the tube when grazing is cut on CMR. AUM fees force others out. Condemnation of inholdings grab more tax base after endangered species are introduced. Cabin owners are forced to vacant for the same reason. Hunting becomes more restrictive. Fishing and other family recreation remains confined at present areas without an opportunity for expansion. Of course, this isn't spelled out in Alternative B, but all the gears are shifting to make it happen.

The obvious problem right now is the proposed cut in grazing. The priority scheme established by Executive Order 7509 and reiterated in the recent Ninth Circuit Court decision stipulated that resources shall first be utilized for 400,000 sharp-tail grouse and 1500 antelope, the primary species, and such nonpredatory secondary species in such numbers to maintain a balanced wildlife population.

Nowhere in the EIS does it talk about numbers of wildlife on CMR or whether or not the criteria in Executive Order 7509 has already been met. Logically, that would be the key to what, if any, grazing cuts should be made. In all of -- If all of these species are already there, then this EIS exercise is really for nothing.

Both tour routes and nature trails are of very little interest to people living in the counties containing CMR or others already utilizing the lake. The large number of boaters regularly on the lake know every nook and cranny, and newcomers have no problem getting acquainted.

The Courier would certainly discourage long walks on isolated nature trails for anyone not fully informed on rabies and bubonic plague. Dozens of people in Valley County have been chased by rabid skunks over the past few years. A half dozen people in our county have undergone treatment for rabies because of exposure to the disease. The Great Falls Tribune this week carried a story of a 12-year-old girl dying of rabies, and no one knows how she got the disease. Now our county has been under rabies quarantine a long time.

Last year, a rabbit died of bubonic plague in a prairie dog down near Miles City. At least 35 persons in other states contracted bubonic plague from fleas on wildlife last year and some died. CMR is bulging with prairie dogs.

We asked in 1980 that a comprehensive health monitoring plan especially for nongame species play a prominent role in the CMR planning process, but we were told it was not within the scope of the EIS. What about the health factor involved when people are encouraged to get that once-in-a-lifetime opportunity as suggested in the EIS to view a black-footed ferret who lives in a prairie dog town?

Ignoring nongame wildlife health in the planning process is, at the very least, deplorable and indicates a complete disregard for human life.

At this point, however, we commend Refuge Manager Ralph Fries for his response to our concerns by having a number of nongame animals checked out by state veterinarians many years ago. But that was one man's response to an expressed concern, not general policy.

CMR is dead center of a serious spread of rabies, and even worse, it has probably the largest concentration of prairie dogs in the nation, playing host to fleas that could be passing along the bubonic plague.

The Courier will not give up its crusade for health monitoring with periodic and reliable reports, preferably from state veterinarians, on results.

Of the alternatives offered, we can support only Alternative A, present management, or D, multiple use. I thank you.

HEARINGS OFFICER: After Marlyn Orahood is R. C. Heald.

MRS. ORAHOOD: Good evening, I am Marlyn Orahood from Malta, Montana, which is in the County of Phillips. Phillips and Valley County border the Charles M. Russell National Wildlife Refuge. My husband, Wesley, and I, belong to the Wittmayer Grazing Association, which has a grazing allotment on the CMR. I am representing the Malta City Council and the Malta Area Chamber of Commerce. The towns and counties derive a lot of economic stability from the livestock production within the counties.

How many people were testifying here tonight -- for or against the proposed alternative that the Fish and Wildlife Service are suggesting -- are well informed about the C. M. Russell Wildlife Refuge and how important the grazing allotment is to our area? Have you visited the CMR extensively enough to say you know anything about it? Or have you been involved in the actual use of it to the point that part of your well-being relies on the CMR, such as using it for recreation, like a cabin on its lakeshore, or boating on the lake, camping and hunting in the rougher areas or using it to graze your livestock?

The livestock industry supports in a chain reaction all of the other means that people have of making a living in our counties. That livestock that grazes on CMR or is owned by the producer must pay our taxes, and for our food, machinery, clothes, our newspaper and any other commodity that people invest their money in to make a life for themselves. The tinker, the tailor, the cowboy, the sailor, doctor, lawyer, merchant and thief are paid so they can spend money to support other people.

Livestock men are naturalists, conservationists and they protect the environment. If these producers were not aware and using good farming and ranching practices, land would have been well used up by now, with production greatly reduced. The livestock operations on or near the CMR Refuge have contributed part of themselves and their livelihood to the success of the wildlife management on the CMR.

The farmers and ranchers that rely on the CMR to graze their livestock know that the Fish and Wildlife Service have presented a confusing, inconsistent, inaccurate and biased opinion in this informational DEIS for the general public to form opinions that reflect comprehensive thinking.

For more information about this misrepresentation of so-called facts, please refer to the written testimony that Chuck Hitch gave on page 250 and the testimony that Robert M. Hyde, Ph.D., gave on page 302 of the 1984 DEIS. When the DEIS was written, there were many inconsistencies in the presentation. What was good or allowable for one alternative was not valued in the next alternative.

The federal government is working against itself. The FHA set up the Wittmayer Grazing Association's financing. The Association was set up for ranchers who had ample hay base, but not enough grazing. This association was financed in such a fashion so the rancher could make a living, as well as buy grazing rights for his livestock. Part of this association is on the CMR. The Fish and Wildlife, in direct contradiction of the FHA, is attempting to cut grazing rights, making it impossible to pay for this after paying into the Association for 14 years.

This whole process of eliminating the grazing rights has been a study in mismanagement and waste on the part of the federal government and the Fish and Wildlife Service. This waste is paid for by all of us, the taxpayers of Montana. We have and are paying for wasted time, wasted money and wasted manpower.

This DEIS has been confusing because the range specialists say that the range is 92 percent in excellent to good condition. Then the FWS turns around and says that the livestock AUMs have to be cut. The EIS doesn't brag and say that they know how many wildlife animals are on the refuge, nor do they tell us how many birds live on the refuge.

The original Executive Order 7509 called for 400,000 sharp-tailed grouse and 1500 antelope and such nonpredatory species that will maintain a balanced wildlife population. It also allowed for the grazing of livestock. Perhaps because of mismanagement, the Fish and Wildlife Service isn't aware of just how much wildlife has overflowed onto the farmers' and ranchers' deeded land.

This DEIS has included the privately owned land that is within the CMR. This includes state land, school sections and land owned by private citizens. This deeded land is used for cattle grazing. Will these private citizens have to carry the wildlife as well as their own cattle and not be able to use CMR for part of their grazing allotment?

Do you know why they have hearings about CMR in Missoula? This hearing is here because the Fish and Wildlife Service needs input from people who have been presented a very biased report, but not an honest, factual statement about the conditions on the CMR.

Citizens, you have been misled by a federal government bureau called Fish and Wildlife Service. They are trying to make work for themselves so they can keep their soft, cushiony jobs.

Ask the Fish and Wildlife how many antelope, deer and elk are on the refuge. Then ask them how many antelope, deer and elk the farmers and ranchers are feeding because these species won't eat old grass. This wildlife wants new green grass. Because CMR is in excellent condition with lots of old grass, the wildlife has come out onto the grain fields, meadows hay, alfalfa and alfalfa seed fields to get grain feed. If livestock who will eat old grass are kept on the CMR, the old grass will get used and the antelope, deer and elk will stay on the new green grass that is growing.

The Fish and Wildlife Service has promoted and actually wasted natural resources on CMR. They are planning burns to get rid of the old grass in Garfield County. The livestock, cattle and sheep will eat this old grass if they are given a chance in this management scheme.

The Fish and Wildlife have allowed the prairie dog towns to get out of hand. The reasoning for having prairie dog towns is to transplant black-footed ferrets to these towns in the hope they will feed upon the prairie dogs and then reproduce rather rapidly and then be removed from the endangered specie list. But black-footed ferrets are predators and the Executive Order 7509 explicitly said nonpredatory.

Now envision a prairie dog town on the outer fringes of CMR, like on Holly Flat or over near Burkes, who have their headquarters on private land within the refuge. Prairie dog towns grow by leaps and bounds. In 1974, there were 53 prairie dog towns on the CMR, and in 1980, there are 112 towns on the CMR. As the dogs use up the feed so neither they nor any other animal has anything to eat, they move out onto the farmers' and the ranchers' private land. What will the Fish and Wildlife Service do then? Condemn the private land, like in communism, so that a predator will have room to multiply? Think about this.

The Holly Flat I mentioned, at one time produced enough hay to feed over 600 head of cows in the winter. Now it is all just one huge prairie dog town. There is no wild hay left for anything to graze upon. Nearly 8 percent of the overgrazed land on C. M. Russell is prairie dog towns.

I would like it to be known that I prefer Alternative A of all of the alternatives that have been put forward in the Charles M. Russell National Wildlife Refuge Draft Environmental Impact Statement. Thank you.

HEARINGS OFFICER: After R. C. Heald is Don Essig.

MR. HEALD: I'm Bob Heald and I don't represent any group in the world. I live out here at Turah, Montana. I've been retired for about 10 or 11 years. I have a cabin on Ft. Peck. I have a boat up there. I spend approximately -- I would hate to tell you how many hours a day on that lake. I raised field trial dogs for many years and I run my dogs and walked many acres of Ft. Peck and around it.

And I surely am in all sympathy with the ranchers up there. I cannot imagine -- Now I consider myself a sportsman, not just a hunter or fisherman. I have never, never been refused anyplace to hunt up there, private access either. I have stayed with these people; I've worked with them; I know their problems. I go out calving with them. They're great up there. They're strictly a hardy bunch, believe me.

I also try to be a environmentalist up to the point that it improves my hunting and fishing. I used to pack horses up them hills. I've hunted here, I hunted around Billings. There's no finer hunting anywhere, and there's no finer hunting than there is up there right now. It's unbelievable. You just can't find an area around here that can compare with it.

I've been in trouble on the lake. I just can't imagine, if you run the ranchers out, where you're going to go for help, and I work at a marina up there once in a while and we do need help. Believe me, you just don't walk into an area as big as that is and not have problems.

I don't have -- I just heard about this hearing this afternoon. I don't have any speeches or things prepared, but, believe me, these ranchers don't have to be hassled any more or any grazing taken away from them. They've got all they can do to fight the elements up there now. Please keep it the way it is. Don't change it. We don't need any more hassle up there.

HEARINGS OFFICER: After Don is Lynn Grobel.

MR. ESSIG: Hi, my name is Don Essig and I'm just speaking for myself as a member of the public that supposedly owns CMR. I support the Fish and Wildlife Service in their proposed alternative. I think reduction in livestock grazing is long overdue.

Wildlife refuges, after all, are wildlife refuges, and the purpose is primarily, as I understand it, for wildlife. And it seems to me that the current situation out there has somewhat skewed away from that, and I think the current proposal is the first step toward rectifying what's been a long-time corruption of the wildlife refuge purpose. Thank you.

HEARINGS OFFICER: After Lynn is Mark Etchart.

MR. GROBEL: My name is Lynn Grobel. I am president of the First National Bank of Glasgow, Montana, and I've been asked to come here to read a statement prepared by Greg Pauley, who is the executive secretary of Walleyes Unlimited. And I would like to read a statement on their behalf, and then I have a few brief remarks of my own, speaking as a banker.

Walleyes Unlimited in Montana, with a membership of 4,056 concerned fishermen, has serious objections to the DEIS for the management of the CMR Wildlife Refuge. Very little

consideration is given in any of the management alternatives to the concern of fishing and the economic benefits that could be derived from Ft. Peck Reservoir if the Fish and Wildlife management plans did not effectively isolate the reservoir from the majority of fishermen.

With a shoreline greater than the state of California, all-weather access is limited presently to seven locations that are sometimes more than 30 miles apart. Even if the fish and wildlife don't consider fishing as an important aspect of total management, safety consideration for boaters and fishermen would seem to be a logical concern for this Draft EIS to address.

Lake Sacajawea in North Dakota and Lake Oahe in South Dakota are very comparable to Ft. Peck Reservoir in terms of fishing and, to a large part, in providing large areas for wildlife. The fishing industry in these areas is valued at close to $500,000,000 a year to those various states' economies.

Nowhere in the economic impacts of the management plans can the reader find mention to the impacts that these plans will have in terms of fishing and related economic activities. Wildlife abounds around these reservoirs. Major access is provided every 10 to 15 miles on Lake Sacajawea and on Lake Oahe, leaving large blocks of land available to wildlife. 1

Ft. Peck represents in size and importance the major

water source and the major recreation area for the one-third -- for one-third of the state of Montana. If these same plans were to determine the management for the Flathead Lake area in western Montana, the impact to recreation certainly would not have been left out of the DEIS.

When the Fish and Wildlife are planning to reintroduce endangered species, such as the black-footed ferret, and totally ignores its responsibilities to the first name in its title, namely fish, the validity of these plans must be given serious consideration.

None of the five proposals in the DEIS are acceptable to Walleyes Unlimited, but the multiple use proposal, Alternative D, would allow for some reasonable opportunities for developing the recreational protection that our group is working towards.

The no action plan, which sums up what the Fish and Wildlife Service has done for fishing, would be our second choice.

From a banking standpoint, I would have to say that proposals A and D are the only ones that we would look at as acceptable -- acceptable to the bankers of northeastern Montana, as well as a solid majority of their customers.

We know that the ranchers and many of the farmers in northeastern Montana are fighting for their economic existence. The radical changes proposed in alternate B, C and E would only

impose further hardship on the rancher-farmer who are the economic backbone of northeastern Montana. Thank you for the opportunity to comment.

HEARINGS OFFICER: After Mark is Bob Ross.

MR. ETCHART: Mr. Hearings officer and fellow people interested in the CMR Game Range: I am Mark Etchart, Glasgow, Montana. I'm in the Montana Legislature as a state senator, I'm a cattle rancher, I ranch on the Charlie Russell Game Range, I am a member of the Badlands Grazing District, and the statement that I have here tonight to read into the record is a statement that the Badlands Grazing District asked me to present at this hearing.

We support the objectives of the Draft Environmental Impact Statement for multiple use management of the Charles M. Russell Wildlife Refuge Game Range. Until implementation of this, we support the no action alternative for these reasons: The DEIS proposes a one-third cut in livestock grazing, which will be a serious financial loss in seven northeastern Montana counties. The losers would be businessmen, ranchers, and schools, which would lose tax base on livestock which were cut back. Present management has produced an abundance of game, with all other users -- recreationists, boaters, cabin owners -- very well satisfied. This is the idea of multiple use.

The Fish and Wildlife Service proposal narrows the use to game habitat at a time that game abounds. Their action threatens most users of the CMR. It would be a serious financial loss to the state and nation, with very little, if any, gain.

Contrary to Fish and Wildlife position, I think there is authority for this in Executive Order 7509 and the U.S. Circuit Court of Appeals' decision.

This is the second of these hearings that I've taken in -- I took in the one at Glasgow -- and to this point, I've only heard three individuals testify in favor of the Fish and Wildlife proposal. I've heard the Audubon Society in opposition at both meetings and we see the national organizations -- the Defenders of Wildlife, the National Wildlife Federation, their attorney, and so on, ex-Fish and Wildlife employees -- are our principal adversaries, but I submit that even though you may have been up on the game range six or eight times, it really doesn't make you an expert. What makes Montana is the people who live there, and that's true of northeast Montana. Thank you.

HEARINGS OFFICER: After Bob is R. G. Wiltfong.

MR. ROSS: Mr. Chairman and ladies and gentlemen, my name is Bob Ross. My profession is range ecologist, and I happen to be one of the four range scientists that conducted the ecological range site and condition inventory in 1978 at the request of the Fish and Wildlife Service, and I would just like to -- I'm sorry that -- Mr. Attorney left, didn't he? Did the attorney leave that was here? I'm sorry he left, because he referred to the environmentalists as conservationists, and who, pray tell, is a better conservationist than a farmer or a rancher? I would lots rather that he had referred to the environmentalists as a whole as preservationists, rather than conservationists. I like to think of a conservationist as one who practices wise use without abuse. And right here, I would like to compliment -- In the same breath, I would like to compliment the Fish and Wildlife Service on the C. M. Russell Game Range -- excuse me, Game Refuge for the job of range management that has been done as far as maintaining the range condition as it is right now.

And speaking of range condition, again I would like to refer to the 1984 EIS and that is -- forgot on what page it is, but -- Oh, I have it written down here, page 43. It states there that 92 percent of the three-quarter -- a little over three-quarter million acres on the refuge is in good to excellent condition. 92 percent, folks. 7 percent is in fair condition, 1 percent in poor condition.

And I might add and reiterate what one of the ladies said before here, that all of nearly -- I would say that all of the poor condition range and most of the fair condition range is on the prairie dog towns, caused by the prairie dogs, and probably those figures that I just quoted of range condition has probably changed some because the lady stated the prairie dog towns have doubled in number of towns. And certainly if they had doubled in number of towns, they have more -- they have probably quadrupled in acres of area or probably even more than that.

But as I stated, I was one of the four range conservationists, range scientists, that made the ecological range site and condition survey, and we went over the area foot by foot and did a, if I might say so myself, a very good job of turning out a good, sound range site and condition survey.

However, we didn't -- We four range scientists were not allowed to compute the stocking rate figures, which should have been based on a range site and condition survey. Our job was finished as soon as we got the range sites, range condition classes delineated on the aerial photographs. From there on, apparently the Fish and Wildlife Service, or whoever they hired, did the stocking rate computations.

I might just say here, for the record, I would like to state what we mean by ecological range site and condition class. Of course, a range site is a particular soil in a given climate. That's what the combination of the two is, a range site. Then that particular range site can have various kinds of range condition depending upon the kinds of plants that exist there at that time, on that site, in that precipitation pattern, compared to what Mother Nature would have there or could have there. So it's strictly an ecological, very, very sound method of arriving at a basis for management, whether it be game animals, prairie dogs, wildlife or whatnot. The basis is having a sound ecological inventory.

I might add that in the EIS, both the earlier one and the one developed in 1984, it was inferred that due to a good year in 1978, when we made our site and condition inventory, that due to a good year, we may have been influenced by weather conditions. Well, with the method that we used, you aren't influenced by anything except the vegetation that's growing on that particular site, that day that we see it, and with that given precipitation. We can make range site condition surveys at any time of the year as long as we can see the ground and identify the vegetation.

I might also add that the estimated -- well, first of all, I've got to say this: The stocking rate cuts or utilization cuts made by the Fish and Wildlife Service just simply were not justified.

I think maybe if John Lacey gets a chance to talk after a while, I think he might talk a little more on this, so I'm not going to go into it very deep, but I would like to say that the short steep slopes utilization cuts that were made on the short steep slopes simply were not justified in that part of the country.

And, also, the distance from water is not a major concern to livestock grazing or game animals either one, as far as that goes. And yet the cuts that were made on that were really very, very severe.

So, taking that into effect and estimating the stocking rate based upon the Soil Conservation Service grazing guides that we use in our profession, we estimated that there should be approximately 144,000 AUMs of grazing. Now, this is based on the Soil Conservation Service grazing guides. 144,000 AUMs of grazing.

However, the present allotment for grazing, as it is today, is, I believe, 60,000, if I'm not mistaken. And incidentally, this 60,000 amounts to 42 percent, 42 percent of the available grazing.

Now, this is eliminating, wiping out the private lands that are within the refuge and the state-owned lands -- strictly the federal lands within the refuge -- that the livestock grazing that's on there now, that's allocated now, is only 42 percent of the AUMs that are available in a normal year. And if you cut that again 33 percent, it's going to be quite a wallop and reduce that 42 percent that much more. Whoever the mathematicians are, you can figure it out.

Nothing is mentioned in the EIS towards range condition trends and trend is a very important thing to a range scientist. In fact, you aren't even a range scientist. You don't understand range ecology and range conditions until you can also read range trend. And the trend in that area, in the CMR Game Refuge, is definitely on the upgrade and has been for a good many years.

I might add, I wanted to plug in here a little while ago that when you've got an area that's 92 percent in good to excellent condition, anybody in their right mind knows that there's neither too much livestock grazing on there or game animals either one. It's just that simple.

HEARINGS OFFICER: Say, Bob, I don't mean to interrupt, but you've gone several minutes past your time. If you can wrap it up.

MR. ROSS: I'll wrap it up real quick. I want to talk just a minute about economics, and it's been touched upon here, but it's very important. Now, if you realize that livestock -- The livestock industry is by far the largest income producing industry in the state of Montana. And especially in that area, it's even more so than it is through the state as a general rule, because that's strictly a livestock grazing area, except for small acreages or acreages of grain farming. But it's a very important thing over there on both sides of the river.

It was stated before that the economics of the rancher -- and one of the gentlemen here stated that it bounces back and forth 14 times. I've heard it stated by economists that an agricultural dollar will bounce up and down the street about 7 times. And the point I'm trying to make is that the economic dollar isn't only important to the individual ranchers that are running livestock on that refuge, but also the rest of the community all the way around in the towns, whether it be from Billings, Missoula and so on. It all goes back to the grocer man, the fillings station man, the implement dealer, the bartender, the school teachers, the school kids and everybody all concerned.

So, I would like to strongly urge that the Fish and Wildlife Service leave things as they are as far as the proposals are concerned, and if it ain't broke, don't fix it.

HEARINGS OFFICER: Appreciate your comments, for your statistics and your analysis, Bob. If they have all that in writing, they can analyze it and thoroughly go through it.

It's difficult for anyone to, I think, in five minutes, successfully break down complex numbers and analyze the things and so that's why we ask that these matters be put in writing. Thank you. After Mr. Wiltfong is Walt Collins.

MR. WILTFONG: My name is R. G. Wiltfong. I own a small family-size business in Glasgow. By now you know that community has witnessed several severe economic ups and downs over the years. Some of the ups, of course, were when Ft. Peck was first constructed in the 30's. In fact, it started in 1933. Another up was the World War II base, constructed north of town just a short distance, in the 40's. And in the 60's, we had a SAC base about 19 miles north of town.

After each up, we had a severe down. And through all those ups and downs, the agri-business community, at least since the latter part of the 40's, has experienced a declining price for their wholesale commodities that they create in relation to economic indicators, but an ever-increasing price on everything they buy at retail price. The 70's showed us several externally triggered recessions, and now in the early 80's we're threatened with a new threat. True, it's maybe not as big to Glasgow, but it's bigger in scope all over the area. A 33 percent reduction in AUMs on the C.M. operated by an agency of the federal government is not justified, in my opinion.

It should be understood, though, by those here tonight that the residents around the CMR are not opposed to wildlife. We are not opposed to conservation of resources, and we are not opposed in general to multiple use.

The farms and ranches adjacent to the CMR provide most of the wintering feed and a good part of the summer feed for a very large portion of the wildlife. The range for cattle, as you just heard from Mr. Ross, within the CMR is rated 92 percent good to excellent overall, and the rancher has accepted this exchange of feeding wildlife and having AUMs on the CMR.

Those lands cannot presently be traversed by vehicles, except on designated roads. Access to the 1500 to 1600 miles of shoreline has already been reduced to less than 10 access roads. No buildings can be erected without proper permit subject to annual inspections. The few cabin sites along the lake front represent about 1 percent of the total shoreline. The rest is virtually untouched. This land has not changed nor will it change even if the no action alternative is adopted. There's no way it can.

Now, the wildlife has flourished because of the farming and ranching activities, not because of a government agency or increased rainfall.

Because of the farming and ranching endeavors on his own private property, land adjacent to the CMR has produced food for his cattle and wildlife on the CMR and also on private lands. It is the elk that are present on the CMR as a result of sportsmen and ranchers and the Montana Department of Fish, Wildlife and Parks -- then known as the Montana Fish and Game -- who jointly placed them there. Now, the people that did that -- and I, of course, was around there, having lived there all my life -- we never envisioned we would have that many elk some day. That's quite a surprise to us now to have that many. They've really done well.

There's no evidence that the U.S. Fish and Wildlife Service has done our area any good whatsoever, with the exception of good management on some of the AUM areas.

As far as enhancing wildlife, none, if anything, that they've really done, because the cattlemen have really been the

people that have produced the wildlife.

If, however, some of these proposals are allowed to be implemented and the experimentations envisioned by some of those alternatives, I feel we may have numerous new problems that will make these look rather small. Thank you.

HEARINGS OFFICER: Thank you. After Walt is John Lacey.

MR. COLLINS: Thank you, Mr. Hearings Officer and ladies and gentlemen. My name is Walt Collins and I am speaking on behalf of myself as a rancher and permittee on the CMR.

The proposed alternative in the DEIS is to cut the livestock grazing an average of 33 percent, game range wide. On our ranch, the cuts would be 28 percent on the home unit and 29 percent on the Twitchell unit. That reduces total cow numbers on the two units 157 head of cattle. This relates to an approximate $45,000 a year gross income loss.

With that type of a loss, my operation will no longer be a viable operation. It would be almost impossible to gear our cost down due to the capital outlay already invested in the land, machinery and equipment. Fuel, repairs and labor would not decrease.

I wonder how many of you people could digest that type of a loss. If this proposed alternative affected your livelihood as it will mine and a great number of other users,

what would your reaction and response be to the U.S. Fish and Wildlife Service?

The personnel managing the CMR claim to be expert, professional wildlife managers, but who really raises and manages the wildlife in that area? The ranchers adjoining the CMR are the specialists. Let me assure you, there would be no wildlife if it wasn't for the rancher who loves and enjoys the wildlife as much as or more than you do.

This brings me to this inquiry: Just why are the Fish and Wildlife Service trying to penalize us by removing 33 percent of the livestock for raising the abundant wildlife that inhabit the area on or off the CMR?

I have studied the Executive Order 7509 and the latest Appellant Court decision and I cannot find anything in either order that prohibits Fish and Wildlife Service from administering this area under Alternatives A or D of the DEIS.

A multiple use has worked in the past and it will in the future. Wildlife will flourish and we, as ranchers, can get on with our job of producing the beef that lies between Wendy's buns. Thank you.

HEARINGS OFFICER: Thank you. After John is Mons Teigen.

MR. LACEY: Thank you. I appreciate the opportunity to comment on the EIS of this importance. My name is John Lacey. I'm an extension range specialist with the Montana

State University. I work out of Bozeman. Tonight I'm here to discuss the three major concerns that I have about this environmental statement, and I want my comments to be heard because I feel the EIS -- particularly the proposed alternative -- is grossly inadequate from a resource standpoint.

My first concern regards the ecological site concept that Mr. Ross described, and this ecological site concept is the best method we have of evaluating natural resource on the Northern Great Plains. It is a starting point, like Bob mentioned. It looks at the vegetation, the soils and the climate. It puts all three together. And that's the starting point.

I have taught school at the University of Arizona and at South Dakota State University. I've taught ecology, and any ecology book you pick up is going to tell you that the greatest abundance and diversity of plants and animals is going to occur on the vegetation communities that are higher up in the successional scale. When these fellows say that 92 percent of the CMR is in good or excellent condition, the wildlife and the plant communities are as stable as they are ever going to be.

I guess my second major concern regards the methodology that was used to determine how -- what the proposed livestock carrying stocking regs should be. And I'm concerned there because when I read the Environmental Impact Statement, they've got in there calculations. And it says, for example, if there is a slope that ranges from 11 to 25 percent, that is from one-quarter to one-half mile from water in this EIS, the way the livestock carrying capacity was calculated, they say that on that particular site, there should be an 89 percent cut in livestock. That tells us that if there's enough grass for 100 cows for one month, the way this environmental impact is written, they would let 11 cows graze there for one month's time. In other words, an 89 percent cut.

If we go to the USDA Forest Service or SCS National handbooks, it will say that cattle will utilize rough and steep terrain from one-quarter to one-half mile. That's optimal water development. So these cuts, according to all range literature, are completely unjustified.

When I go through, Bob estimated what the carrying capacity was based on the site deal, and I guess another way to do it is figure up the range site on it, add up the total amount of grass that's grown in there -- and there's going to be a little bit of cactus and sagebrush. I'm conservative, so I know cows won't eat cactus.

So, I figured how much acres in each of the range sites and I said if it was all in excellent condition, there would be that much grass. I said that's not so. I assumed it was all in good condition. 92 percent is good or excellent. Then I just took off 25 percent of the total pounds of herbage. I said this total pounds of herbage, you know, there's going to

be sagebrush, there's going to be other kinds of shrubs and cactus that cows won't eat. So I multiplied it by .75, came up with a total number of pounds out there then for the whole federal range. I divided it by 660 pounds, which a thousand pound cow would eat, and I come out that 11 percent of the total vegetation produced out there is presently allocated to livestock. 11 percent. Under these conditions, I don't see how any agency can recommend a reduction in livestock.

My third major concern regards the philosophy that's contained within the EIS. When I read through the EIS, I get the feeling that there is a necessary and continual confrontation between livestock and wildlife. This is simply not true. I believe that if wildlife is in an area and if the range is overgrazed by livestock, then, yes, there will be a conflict, but when only 11 percent of the vegetation is being used by livestock, there is simply no confrontation.

In some small spots in the EIS, undoubtedly around a water hole, there might be a sore spot and there might be an area that needs to be addressed, but the EIS, as it is written now, does not mention range trend. It does not look at site specific areas.

I would suggest that the range scientists, the ranchers, along with the Fish and Wildlife Service, start monitoring these areas together where there may be a sore spot, and if they document a sore spot in the future, then they

should take action on those sore spots and not just allocate a blanket-wide cut for the entire EIS area.

In conclusion tonight, I've tried to mention three concerns: I am concerned that the Fish and Wildlife Service has misinterpreted the ecological site concepts in terms of wildlife.

I am concerned that the livestock cuts are simply not justified now. There is no scientific data presented in the EIS to make any type of decision.

And third, I'm concerned that they assume there is a conflict between wildlife and livestock in that area, which I don't believe.

To wrap this up from a research university situation, I would say that the only alternative that merits consideration at this time would be the no action alternative. Thank you.

HEARINGS OFFICER: Let's take about five minutes for the reporter to change paper.

(Whereupon, the hearing was in recess at 9:13 p.m. and subsequently reconvened at 9:18 p.m., and the following proceedings were had and entered of record:)

HEARINGS OFFICER: As I mentioned before we quit, Mr. Teigen is up, and on deck is Mr. Micone.

MR. TEIGEN: This is the story of my life! I am always on just before the cocktail hour is ready to start. I am Mons L. Teigen, Secretary of the Montana Public Lands Council and

Executive Vice-President of the Montana Stockgrowers Association. I am speaking here this evening on behalf of both organizations, both of which have a large interest in the use of the CMR Game Range.

At the outset, I want to express our appreciation for the Fish and Wildlife Service for allowing this meeting to be held within the state of Montana. I keep thinking, in your interest to get away from the area in controversy, that you'll start holding these in Spokane or Seattle, but at least you stayed in Montana, which is a plus, as far as I'm concerned.

My career includes 20 years in range management and land administration in Montana. During that period, I've become fairly familiar with the area in question. Was born and raised in Petroleum County, one of the counties through which the CMR game range traverses.

The Montana Public Lands Council is composed of public land graziers from within the Montana Stockgrowers Association, the Montana Woolgrowers Association and the Montana Association of State Grazing Districts. As such, it is a separate entity from the parent organizations and is designed to be the public lands spokesman for the three organizations. Over 10,000 Montana farmers and ranchers and their families have pooled their resources in support of the Montana Public Lands Council and look to it to express their views on issues similar to the CMR EIS.

Our comments in 1980 on the previous draft, which were made by Mr. Hitch who was referred to in earlier testimony, pointed up the shortcomings of the document we reviewed at that time.

In reviewing the one we have before us today, we find little improvement. The document is still vague and contradictory. The only thing that seems definite in the document is that there is planned a 19,626 AUM decrease in the amount of livestock use to be allowed. This 33 percent reduction strikes at the core of the livestock enterprises dependent upon the use of the CMR. This tremendous reduction is passed off as insignificant with the suggestion that the loss would only comprise about 3 percent of their aggregate income. I believe it was Mark Twain who once said, "There are liars, and there are damn liars and then there are statisticians." This was called to mind when I read that particular statistic. By your own admission, there are 11 ranchers who could be severely impacted by the proposed action.

While we agree there is a distinction to be made between wildlife habitat and grazing capacity, I would submit that the distinction is far less than the drafters intimate. Those of us in the range livestock business are well aware of the fact that where the forage is, there you will find the wildlife as well. This is true whether it is elk, deer or antelope. If this were not so, the tremendous competition that

presently exists between domestic livestock and wildlife in all areas of the state would be of little consequence.

Try to tell the rancher in western Montana that the elk that descend on his winter range and haystacks is reluctant to compete with domestic livestock. Or tell it to the rancher in the area bordering the CMR who finds huge herds of antelope using the range he's been trying to protec. for his own winter use. The alleged competition between livestock and game is more apparent than real. A recent article in the Great Falls Tribune reported on the benefits of joint elk and cattle use. This type of information should not be overlooked in developing the EIS.

The economic analysis used in the draft was based on cost and return data from only one year: 1979, I believe. Any of you that are the least bit familiar with the Montana livestock industry will recall that 1979 was one of the best years ranchers have experienced in the last 20 or 30. By using this year as the year to determine the impact of the alternative on the ranching community greatly understates the impact. Cost and return data should be based on an average of a number of years -- 10 to 15 at least.

2 We are somewhat perplexed by the wording on page 25 to the effect that neither multiple use or no action alternatives "provide a wildlife refuge situation." Livestock and wildlife have been a part of the ecosystem in that area since long

before the executive order was ever drafted.

Your agency seems so hung up on the refuge concept that one has to make a tremendous search to even find the word "hunting" included in any of the verbiage. The drafters of the document appear to be attempting to make the CMR into some sort of unique area that must be managed as the legendary King's Forest, where all use is forbidden except for the enjoyment of the King.

I would predict that with the livestock reductions you contemplate, coupled with the restricted hunting access proposed, the habitat you are so keen to protect will soon disappear. We believe that you need the livestock as well as the wildlife, and you definitely need a cadre of interested hunters using that area. From my observations, the hunting opportunities in that area are going to be difficult, indeed, if your proposed action is accepted.

In our view, the preferred alternative should be that of multiple use. Realizing that this could probably only be implemented if Congressional action was obtained, we would like to suggest that the no action alternative be utilized until such time as Congress could clarify the multiple use alternative. Thanks for giving us the opportunity to make this presentation.

HEARINGS OFFICER: Thank you. After Mr. Micone is Warren Willmore.

MR. MICONE: Thank you, Mr. Hearings Officer. My name is Mike Micone. I am the Executive Director of the Western Environmental Trade Association, and I am appearing here this evening on behalf of our board of directors.

The Western Environmental Trade Association is a coalition supported by members from agriculture, labor, recreation, business and industry, as well as individuals and other associations. Our coalition was organized for the purpose of promoting employment and economic opportunities in a manner consistent with our physical environment -- with protecting that physical environment.

Our comments this evening relate basically to the point of the economic opportunities available within the state of Montana.

First of all, we would like to say that we don't believe that the agency in its review of the impact statement did not consider the resources -- the entire resources in the area before making their proposal. The proposed alternative does not consider the importance of the economic impacts on the area as reflected in the summary document.

First of all, and you heard this quote earlier this evening and I would like to repeat it: "Grazing and haying activities on the refuge contribute slightly to the regional economy." It goes on to say that the area around the refuge has been characterized by a relatively slow economic growth with an economy based on the production of grain and livestock.

The very nature of the economy being based on the production of grain and livestock would indicate a major impact on the area by the reduction of livestock grazing an average of 33 percent. I don't believe there is anyone in this room that would care to have their income or their potential income reduced by 33 percent. And though this is an average of 33 percent, the cuts would actually vary from 0 to 100 percent. This negative impact not only affects the rancher, but the businesses and the tax base that rely so heavily on the production of the rancher.

In another instance, the summary document states, "Although varying quantities of oil, gas and coal are known to occur, these and other energy resources have a low to moderate potential for development. However, development of these resources outside the refuge and in the surrounding region could increase significantly in the future and would have far reaching impacts on the refuge." This statement, in itself, is contradictory in that, on the one side, the potential for development is low to moderate, and on the other hand, that development could increase significantly.

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The potential for oil development can best be illustrated by the 1983 Lustre Field find in southern Valley County. This is probably the most significant oil development in the state of Montana, with 23 wells producing about five

times the daily average of all the wells in the state. Production for the first quarter of 1984 was 147,000 barrels, and if we are to project this forward for the entire year, it would total about 600,000 barrels, or 1 percent of the state production.

In addition, of all the oil rigs operating in Montana, approximately one-third of those are located in Valley County. And this not only is a significant contribution to the economy of the area, but provides needed revenues for services of the local governments and jobs to the citizens of the communities. This recent development would make it imprudent to deprive future exploration in an area that has proven resources.

There is a philosophical view that multiple use and wildlife are not compatible in the use of our public lands. This view is expressed time and again in the debate over the use of the land, and I believe this reflects a tunnel vision approach to the management of public lands, which is also reflected in the proposed alternative.

We've heard statements, broad statements, about environmentalists, conservationists or preservationists. I know of no purer environmentalist than the rancher of our country.

Domestic livestock and wildlife can coexist without competing with one another. Natural resource development and wildlife can also coexist. The most significant example is

that of a producing well on land owned by the Audubon Society and operated by a major oil company.

Montanans are justifiably proud of the open spaces, wildlife, and clean air and water that give the quality of life in this state a special dimension. We all want to maintain this quality of life, but it is essential that we evaluate the social costs of maintaining stringent programs of control. Montana's people must work in order to achieve a good quality of life, so we must be sure that employment opportunities are not needlessly nullified. A balanced approach is needed to resolve any conflicts between environmental and economic considerations.

And although none of the issues addressed the total resources of the area, we believe the multiple use alternative should be the best to consider, although we realize this can only be implemented with Congressional action. We therefore recommend the no action alternative be adopted. Thank you very much.

HEARINGS OFFICER: Thank you. After Warren is David Blurton.

MR. WILLMORE: Mr. Chairman, friends, I don't have much to say. You've said a lot. But I live six miles from the edge of the Fish and Game boundary. I run cattle on it, and I feel that the impact statements has got to be a big thing. I think with the public lands, the private lands, the state lands,

the farm and ranches that that game feed back and forth on, maybe we better draft for an impact statement.

I also feel that this can go on with words. I've heard some pretty good words here tonight. For years the Federal Fish and Game has authorized to provide habitat for game. The game, as I understand, is in the state of Montana. So, the people in Montana, how much game do you want to run in proportion to income property?

That little ranch I got, I have 120 twenty head of rights on federal lands, lands that we own in the grazing association. I have 50 head of rights in the grazing association across the river in the Square Butte, so I have 150 units. My tax base to the local and the federal runs anywhere from $3,000 to $8,000 to $10,000 a year.

Now you're going to have to raise -- Federal Fish and Game is going to have to raise a lot of game to pick that up. My ranch expense is $50,000 to $60,000 on a 150 cow ranch. So you're going to have to work a lot of game.

I've paid them leases. I have paid them ever since I was that high. I have paid them since 1935. I worked on the first grass when I was a boy of 15 years old. I worked on them before some of you was born.

Also, my family has implemented one of the biggest wildernesses on the North American continent. Look at the Canadian map, you'll find my name, my uncle's name on it.

So I understand both sides. We have to have recreation. We have to have that, but we have to have this production to keep this economy going.

I listened tonight just before I came down here to the man talking about your national debt and that. I'm not sure that this government is going to be able to pay the Fish and Game personnel the wages before very long if them guys was right, so there's what I mean by words. Now, are they right or are they wrong? So, this is still an uproar with your impact statements and all that.

And I definitely recommend multiple use because I need that land to suffice my ranch. Now, the man a few minutes ago said something about impact. All right, until I get them rights definitely decided, I do not build a new shop on that ranch for $8,000 or $9,000. That is a part of your impact. Because if I lose them rights, another neighbor ranch is going to absorb me, and when he absorbs me, that's one set of buildings, one set of machinery and the cuts. And who absorbed me probably takes a cut on the game range. So that's somewhere around 50, 60 head of cows, one set of buildings, one set of machinery that Fergus County doesn't take no taxes on.

So, I recommend multiple use. And I have taken care of game all my life. I have pret' near 500 hours of fire fighting and I didn't get paid wages for it in my lifetime on that Charles M. Russell Game Range and on the BLM around it. The fire across the river, the old one where that few burnt timber is on the southwest side of the highway, I put that out myself on a Sunday afternoon. There's 10 or 12 acres on it. It jumped the highway three times or it would have had the east side. I and my wife was the only one there. So I thank you for this time. I thank you for this hearing, and we'll see you.

HEARINGS OFFICER: Thank you. Tom Sewell is after David.

MR. BLURTON: My name is David Blurton. I'm speaking for myself. I think the comments here tonight have pointed out one of the main deficiencies in the DEIS. There's been a lot spoken about the range condition, 92 percent good or excellent. We've had range specialists speaking here, also, testifying to that.

My question, though, is where the wildlife specialists are speaking. The DEIS, I can't say whether the facts in it are true or false, but they do state that the majority of the wildlife habitat is in fair or worse condition. I think the major fault of the DEIS is, it doesn't demonstrate how the cattle grazing affects the wildlife habitat.

The cattle grazing has been discussed in terms of range conditions, but those range conditions haven't been related to the wildlife habitat. If the cattle use of the -- For example, the .7 percent which is riparian habitat, if the cattle use of that area is what's so destructive to wildlife habitat, then perhaps an alternative should discuss protection of the riparian areas and alternatives to allowing the cattle grazing but in a way where the riparian areas are protected. I think that is a major shortfalling of the DEIS. I would like to see what the wildlife specialists have to say as far as the wildlife habitat and the impact of the cattle upon the wildlife habitat. Thank you.

HEARINGS OFFICER: I've been informed that Tom has already left. Is there anyone else who would like an opportunity at this time to make any comments? This will be the last call. All right.

I appreciate your attention. I find at this time that all who have been here and present have had an ample opportunity to speak and to make their comments known at this hearing, and, therefore, I declare the hearing now adjourned. Thank you.

(End of Proceedings - 9:50 p.m.)

CERTIFICATE

STATE OF MONTANA)
: ss.
County of Missoula)

I, Melody Jeffries, RPR, Official-Freelance Court Reporter for the State of Montana, residing in Missoula, Montana, do hereby certify:

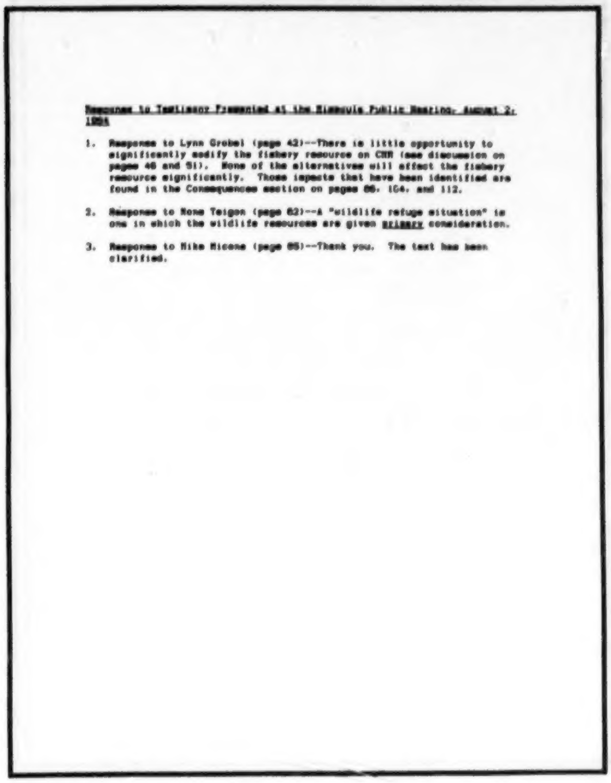
That I was duly authorized to and did report the testimony and evidence in the above-entitled cause;

I further certify that the foregoing pages of this transcript represent a true and accurate transcription of my stenotype notes.

IN WITNESS WHEREOF, I have hereunto set my hand on this the 10th day of August, 1984.

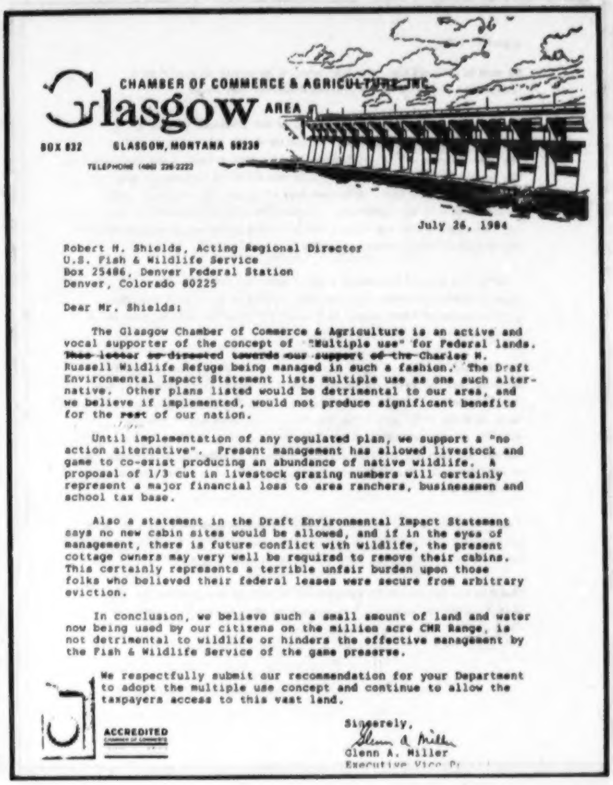
Melody Jeffries

Melody Jeffries, RPR,
Official-Freelance Court Reporter.
Notary Public for the State of Montana,
Residing in Missoula, Montana.



Responses to Testimony Presented at the Missoula Public Hearing, August 2, 1984

1. Responses to Lynn Grobel (page 42)--There is little opportunity to significantly modify the fishery resource on CMR (see discussion on pages 46 and 51). None of the alternatives will affect the fishery resource significantly. Those impacts that have been identified are found in the Consequences section on pages 86, 104, and 112.
2. Response to Mona Teigen (page 62)--A "wildlife refuge situation" is one in which the wildlife resources are given primary consideration.
3. Response to Mike Micone (page 65)--Thank you. The text has been clarified.



Glasgow AREA
CHAMBER OF COMMERCE & AGRICULTURE INC
BOX 832 GLASGOW, MONTANA 59230
TELEPHONE (406) 228-2222

July 26, 1984

Robert H. Shields, Acting Regional Director
U.S. Fish & Wildlife Service
Box 25486, Denver Federal Station
Denver, Colorado 80225

Dear Mr. Shields:

The Glasgow Chamber of Commerce & Agriculture is an active and vocal supporter of the concept of "Multiple use" for Federal lands. ~~Thes letter is directed towards our support of the~~ Charles M. Russell Wildlife Refuge being managed in such a fashion. The Draft Environmental Impact Statement lists multiple use as one such alternative. Other plans listed would be detrimental to our area, and we believe if implemented, would not produce significant benefits for the ~~rest~~ of our nation.

Until implementation of any regulated plan, we support a "no action alternative". Present management has allowed livestock and game to co-exist producing an abundance of native wildlife. A proposal of 1/3 cut in livestock grazing numbers will certainly represent a major financial loss to area ranchers, businessmen and school tax base.

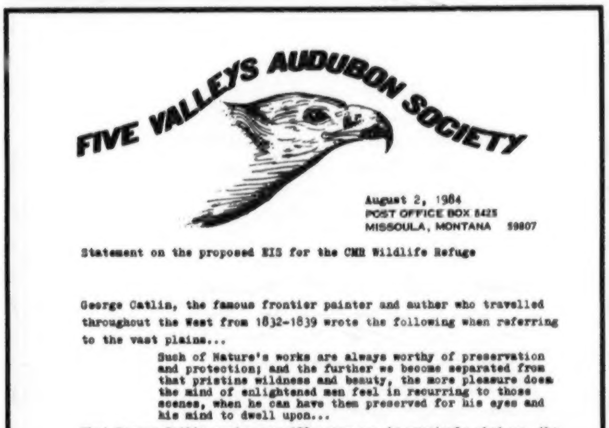
Also a statement in the Draft Environmental Impact Statement says no new cabin sites would be allowed, and if in the eyes of management, there is future conflict with wildlife, the present cottage owners may very well be required to remove their cabins. This certainly represents a terrible unfair burden upon those folks who believed their federal leases were secure from arbitrary eviction.

In conclusion, we believe such a small amount of land and water now being used by our citizens on the million acre CMR Range, is not detrimental to wildlife or hinders the effective management by the Fish & Wildlife Service of the game preserve.

We respectfully submit our recommendation for your Department to adopt the multiple use concept and continue to allow the taxpayers access to this vast land.

ACCREDITED
CHAMBER OF COMMERCE

Sincerely,
Glenn A. Miller
Glenn A. Miller
Executive Vice Pr



FIVE VALLEYS AUDUBON SOCIETY

August 2, 1984
POST OFFICE BOX 8425
MISSOULA, MONTANA 59807

Statement on the proposed EIS for the CMR Wildlife Refuge

George Catlin, the famous frontier painter and auther who travelled throughout the West from 1832-1839 wrote the following when referring to the vast plains...

> Such of Nature's works are always worthy of preservation and protection; and the further we become separated from that pristine wildness and beauty, the more pleasure does the mind of enlightened men feel in recurring to those scenes, when he can have them preserved for his eyes and his mind to dwell upon...

What George Catlin wrote over 150 years ago is precisely what we, the people of Montana are fighting for; the very guts of our state. The reason why Montana is Montana, is because of the values contained within natural areas such as the CMR Wildlife Refuge.

The very words "Wildlife Refuge" should indicate the seriousness of the situation. The area is designed for wildlife because it is a last refuge. The more we denigrate the confines of Refuge for non-wildlife purposes, the more we lose our most precious resource; the wildlife and natural areas of the state. Another loss of habitat here, some over there...and soon, bit by bit over the decades, we rip apart our very heritage. What made Montana, Montana has disappeared.

The Great Plains of yesteryear in the United States have been compared with the Savannahs of present day Africa. Today people travel from all parts of the world to see the animals there. The CMR Wildlife Refuge is a last vestige of the Great Plains and offers the same potential as the Savannah. People spend millions of dollars to soak their senses with the wildlife and wildlands in the state. This is currently the most popular use of

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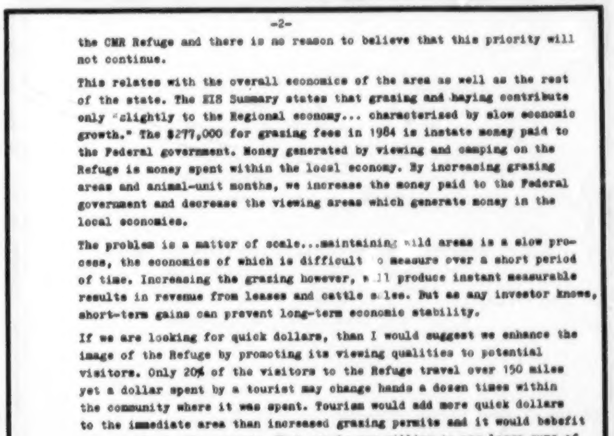


the CMR Refuge and there is no reason to believe that this priority will not continue.

This relates with the overall economics of the area as well as the rest of the state. The EIS Summary states that grazing and haying contribute only "slightly to the Regional economy... characterized by slow economic growth." The $277,000 for grazing fees in 1984 is instate money paid to the Federal government. Money generated by viewing and camping on the Refuge is money spent within the local economy. By increasing grazing areas and animal-unit months, we increase the money paid to the Federal government and decrease the viewing areas which generate money in the local economies.

The problem is a matter of scale...maintaining wild areas is a slow process, the economics of which is difficult to measure over a short period of time. Increasing the grazing however, will produce instant measurable results in revenue from leases and cattle sales. But as any investor knows, short-term gains can prevent long-term economic stability.

If we are looking for quick dollars, than I would suggest we enhance the image of the Refuge by promoting its viewing qualities to potential visitors. Only 20% of the visitors to the Refuge travel over 150 miles yet a dollar spent by a tourist may change hands a dozen times within the community where it was spent. Tourism would add more quick dollars to the immediate area than increased grazing permits and it would bebefit more people in the process. That people are willing to pay large sums of money to visit the state and view the wildlife can best be demonstrated by the sale of out-of-state hunting licenses. One Fish, Parks, and Wildlife official said that even though licenses are more expensive every year, the permits are sold at an earlier date every year.

Promoting wildlife is promoting a clean industry with long-term economic benefits. This is not a question of growth vs. no-growth or development vs. no-development...this is a decision which will affect the lives of all Montanans. Sometime we must put the skids to the trend of diminishing wildlife habitat and if not now...when. The pressure will continue as long as we fail to realize the economic value of preservation.

The CMR Refuge is a quality product in need of repair. The Proposed Action Alternative seems to offer the most rational approach towards the economics and the natural history of the region. I urge that this be given serious consideration. Thank you.

Sincerely,
Byron Weber
Byron Weber, President

August 2, 1984

My name if Walt Collins, and I am speaking on behalf of myself as a rancher and permittee on the Charles M.Russell Game Range.

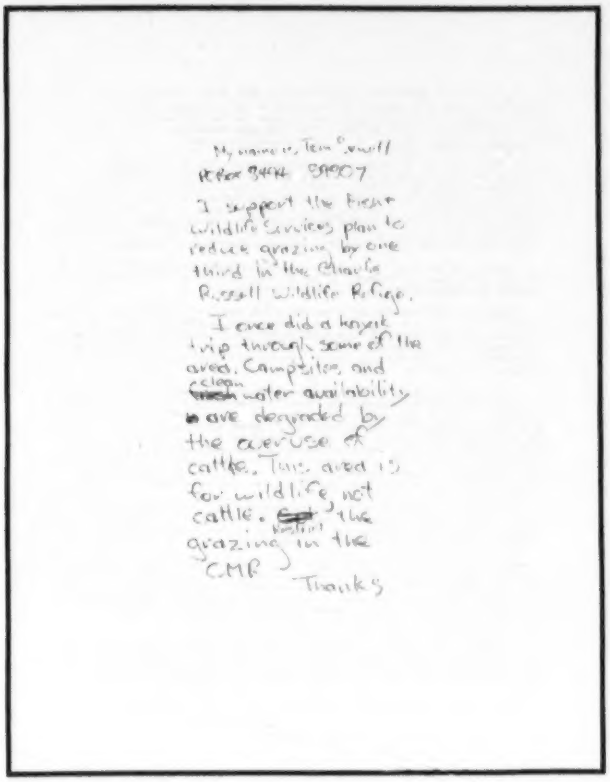
The proposed alternative in the DEIS is to cut livestock grazing an average of 33%, Game Range wide. On our ranch the cuts would be 28% on the home unit and 29% on the Twitchell unit. That reduces total cow numbers on the two units 157 head of cattle. This relates to an approximate $45,000 a year gross income loss. With that type of a loss, my operation would no longer be a viable operation. It would be almost impossible to gear our cost down, due to the capital outlay already invested in land, machinery and equipment. Fuel, repairs and labor would not decrease.

I wonder how many of you people could digest that type of a loss. If this proposed alternative effected your livelihood as it will mine and a great number of other users, what would your reaction and response be to the U.S.Fish and Wildlife Service ?

The personnel managing the CMR claim to be expert professional wildlife managers, but who really raises and manage the wildlife in that area, the rancher adjoining the CMR, or these specialists ? Let me assure you, there would be no wildlife if it wasn't for the rancher who loves and enjoys the wildlife as much or more than you do. This brings me to this inquiry, just why are the Fish and Wildlife Service trying to penalize us by removing 33% of the livestock for raising the abundant wildlife that inhabit the area on or off the CMR ?

I have studied Executive Order 7509 and the latest appellant court decision and I cannot find anything in either order that prohibits the Fish and Wildlife Service from administering this area under Alternatives A or D of the DEIS.

Multiple Use has worked in the past and it will in the future. Wildlife will flourish and we as ranchers can get on with our job of producing the beef that lies between Wendy's buns.

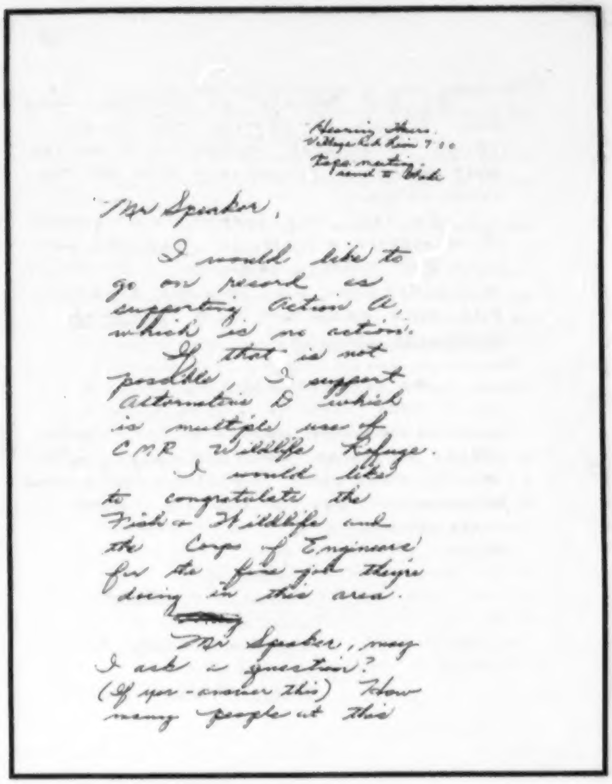


My name is Tom Powell
PO Box 8444 59807

I support the Fish + Wildlife Services plan to reduce grazing by one third in the Charlie Russell Wildlife Refuge.

I once did a kayak trip through some of the area. Campsites, and ~~fresh~~ clean water availability ~~is~~ are degraded by the overuse of cattle. This area is for wildlife, not cattle. ~~Cut~~ Restrict the grazing in the CMR

Thanks



Hearing there
Village Red Lion 7 10
Tape meeting
send to Wash

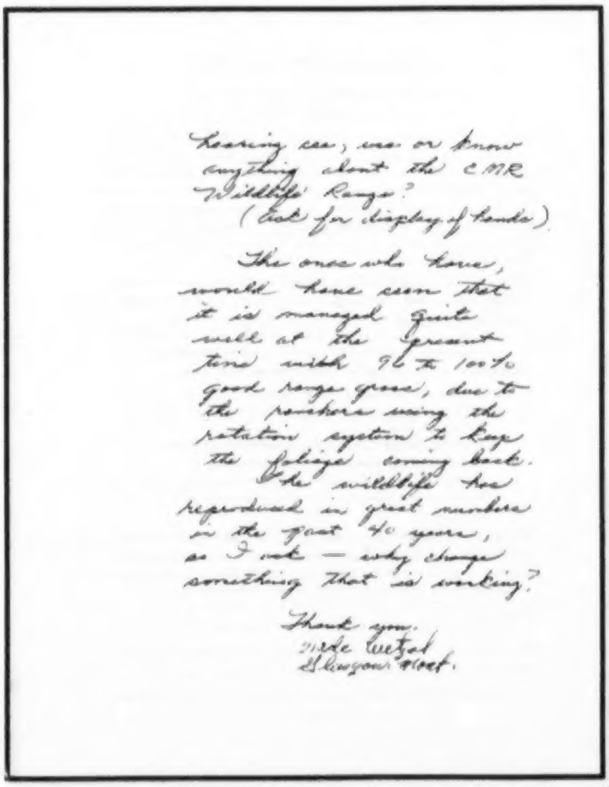
Mr Speaker,

I would like to go on record as supporting Action A, which is no action.

If that is not possible I support Alternative D which is multiple use of CMR Wildlife Refuge.

I would like to congratulate the Fish & Wildlife and the Corps of Engineers for the fine job they're doing in this area.

Mr Speaker, may I ask a question? (If you answer this) How many people at this



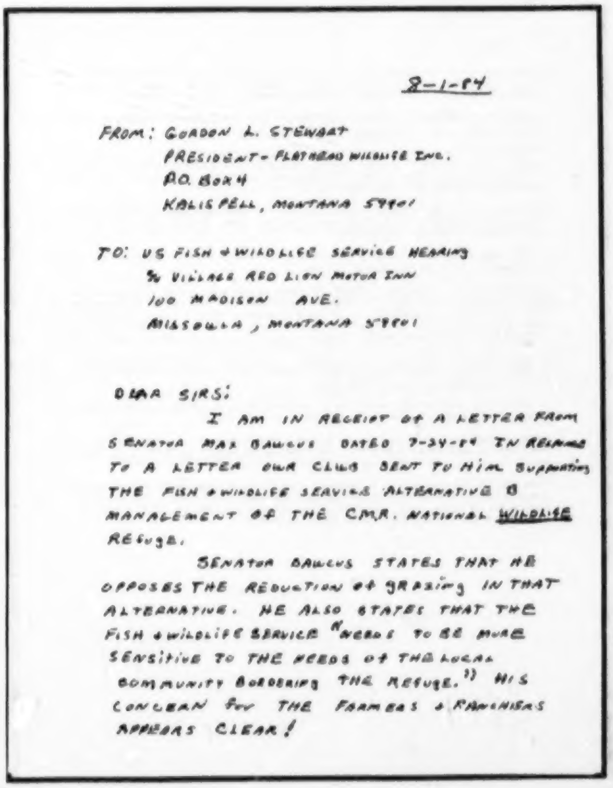
hearing see, use or know anything about the CMR Wildlife Range?

(Ask for display of hands)

The ones who have, would have seen that it is managed quite well at the present time with 96 to 100% good range grass, due to the ranchers using the rotation system to keep the foliage coming back.

The wildlife has reproduced in great numbers in the past 40 years, so I ask — why change something that is working?

Thank you.
Mike Wetzel
Glasgow Mont.



8-1-84

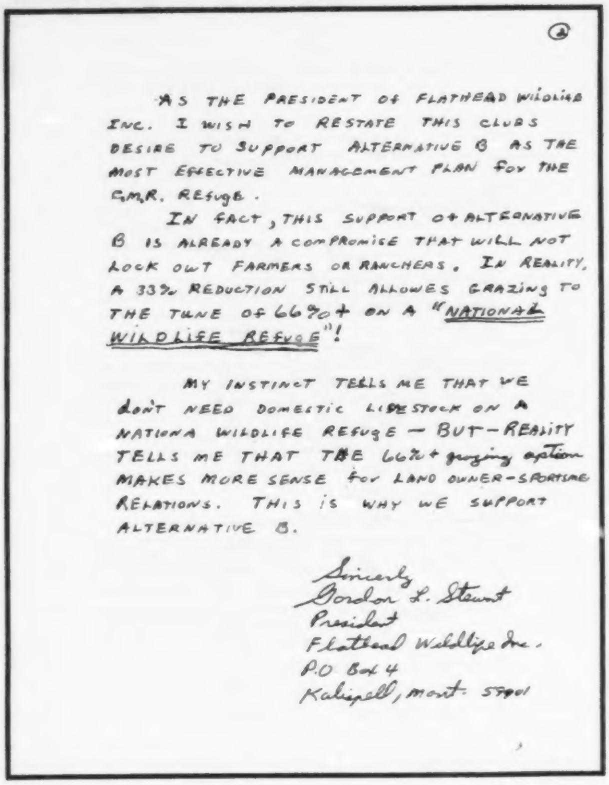
FROM: GORDON L. STEWART
PRESIDENT - FLATHEAD WILDLIFE INC.
P.O. BOX 4
KALISPELL, MONTANA 59901

TO: US FISH + WILDLIFE SERVICE HEARING
% VILLAGE RED LION MOTOR INN
100 MADISON AVE.
MISSOULA, MONTANA 59801

DEAR SIRS:

I AM IN RECEIPT OF A LETTER FROM SENATOR MAX BAUCUS DATED 7-24-84 IN REGARDS TO A LETTER OUR CLUB SENT TO HIM SUPPORTING THE FISH + WILDLIFE SERVICE ALTERNATIVE B MANAGEMENT OF THE C.M.R. NATIONAL WILDLIFE REFUGE.

SENATOR BAUCUS STATES THAT HE OPPOSES THE REDUCTION OF GRAZING IN THAT ALTERNATIVE. HE ALSO STATES THAT THE FISH + WILDLIFE SERVICE "NEEDS TO BE MORE SENSITIVE TO THE NEEDS OF THE LOCAL COMMUNITY BORDERING THE REFUGE." HIS CONCERN FOR THE FARMERS + RANCHERS APPEARS CLEAR!



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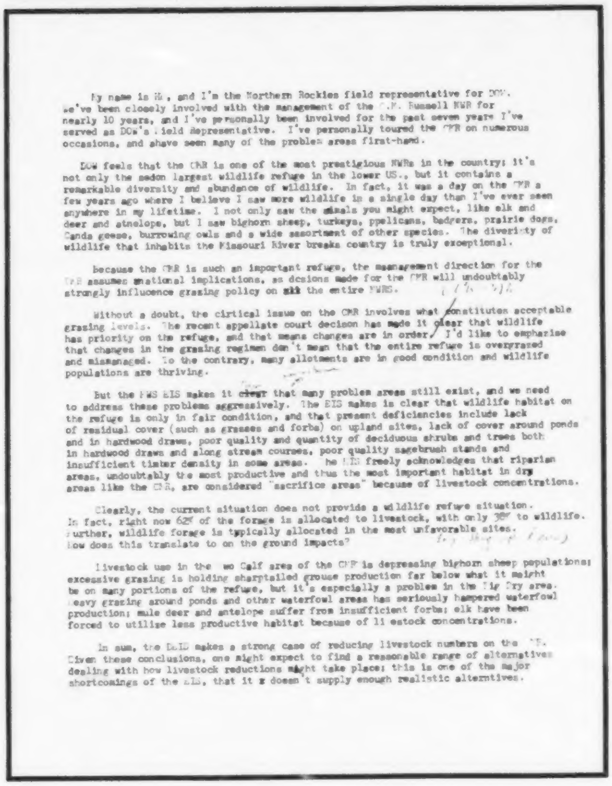
AS THE PRESIDENT OF FLATHEAD WILDLIFE INC. I WISH TO RESTATE THIS CLUBS DESIRE TO SUPPORT ALTERNATIVE B AS THE MOST EFFECTIVE MANAGEMENT PLAN FOR THE C.M.R. REFUGE.

IN FACT, THIS SUPPORT OF ALTERNATIVE B IS ALREADY A COMPROMISE THAT WILL NOT LOCK OUT FARMERS OR RANCHERS. IN REALITY, A 33% REDUCTION STILL ALLOWES GRAZING TO THE TUNE OF 66%+ ON A "NATIONAL WILDLIFE REFUGE"!

MY INSTINCT TELLS ME THAT WE DON'T NEED DOMESTIC LIVESTOCK ON A NATIONA WILDLIFE REFUGE — BUT — REALITY TELLS ME THAT THE 66%+ grazing option MAKES MORE SENSE for LAND OWNER-SPORTSME RELATIONS. THIS IS WHY WE SUPPORT ALTERNATIVE B.

Sincerly
Gordon L. Stewart
President
Flathead Wildlife Inc.
P.O Box 4
Kalispell, mont. 59901



My name is H , and I'm the Northern Rockies field representative for DOW. We've been closely involved with the management of the C.M. Russell NWR for nearly 10 years, and I've personally been involved for the past seven years I've served as DOW's Field Representative. I've personally toured the CMR on numerous occasions, and ahave seen many of the problem areas first-hand.

DOW feels that the CMR is one of the most prestigious NWRs in the country; it's not only the sedon largest wildlife refuge in the lower US., but it contains a remarkable diversity and abundance of wildlife. In fact, it was a day on the CMR a few years ago where I believe I saw more wildlife in a single day than I've ever seen anywhere in my lifetime. I not only saw the aminals you might expect, like elk and deer and atnelope, but I saw bighorn sheep, turkeys, ppelicans, badgers, prairie dogs, Canda geese, burrowing owls and a wide assortment of other species. The diversity of wildlife that inhabits the Missouri River breaks country is truly exceptional.

Because the CMR is such an important refuge, the maanagement direction for the CMR assumes mational implications, as dcsions made for the CMR will undoubtably strongly influcence grazing policy on all the entire NWRS.

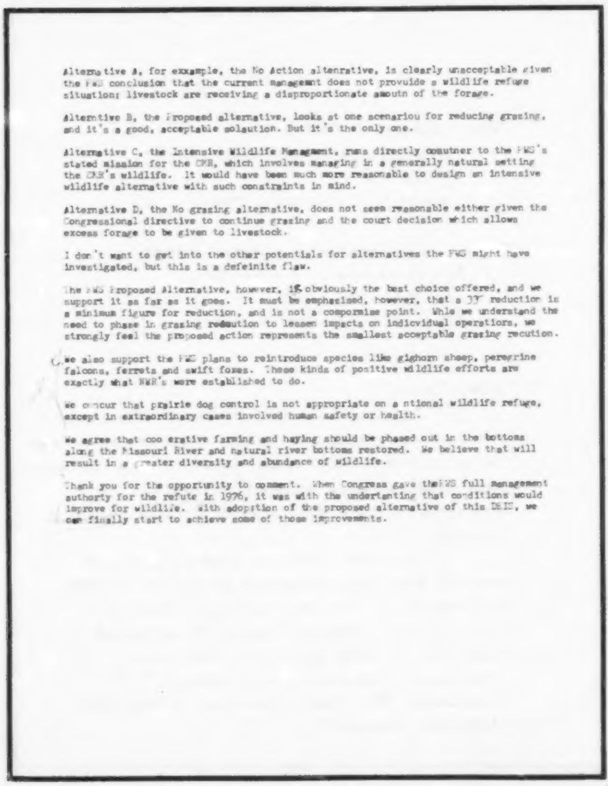
Without a doubt, the cirtical issue on the CMR involves what constitutes acceptable grazing levels. The recent appellate court decison has made it clear that wildlife has priority on the refuge, and that means changes are in order. I'd like to emphazise that changes in the grazing regimen don't mean that the entire refuge is overgrazed and mismanaged. To the contrary, many allotments are in good condition and wildlife populations are thriving.

But the FWS EIS makes it clear that many problem areas still exist, and we need to address these problems aggressively. The EIS makes is clear that wildlife habitat on the refuge is only in fair condition, and that present deficiencies include lack of residual cover (such as grasses and forbs) on upland sites, lack of cover around ponds and in hardwood draws, poor quality and quantity of deciduous shrubs and trees both in hardwood draws and along stream courses, poor quality sagebrush stands and insufficient timber density in some areas. The EIS freely acknowledges that riparian areas, undoubtably the most productive and thus the most important habitat in dry areas like the CMR, are considered "sacrifice areas" because of livestock concentrations.

Clearly, the current situation does not provide a wildlife refuge situation. In fact, right now 62% of the forage is allocated to livestock, with only 38% to wildlife. Further, wildlife forage is typically allocated in the most unfavorable sites. How does this translate to on the ground impacts?

Livestock use in the Two Calf area of the CMR is depressing bighorn sheep populations; excessive grazing is holding sharptailed grouse production far below what it might be on many portions of the refuge, but it's especially a problem in the Big Dry area. Heavy grazing around ponds and other waterfowl areas has seriously hampered waterfowl production; mule deer and antelope suffer from insufficient forbs; elk have been forced to utilize less productive habitat because of livestock concentrations.

In sum, the DEIS makes a strong case of reducing livestock numbers on the CMR. Given these conclusions, one might expect to find a reasonable range of alternatives dealing with how livestock reductions might take place; this is one of the major shortcomings of the EIS, that it x doesn't supply enough realistic alterntives.



Alternative A, for exxample, the No Action altenrative, is clearly unacceptable given the FWS conclusion that the current managemnt does not provuide a wildlife refuge situation; livestock are receiving a disproportionate amoutn of the forage.

Alterntive B, the Proposed alternative, looks at one scenariou for reducing grazing, and it's a good, acceptable solaution. But it's the only one.

Alternative C, the Intensive Wildlife Managemnt, runs directly comutner to the FWS's stated mission for the CMR, which involves managing in a generally natural setting the CMR's wildlife. It would have been much more reasonable to design an intensive wildlife alternative with such constraints in mind.

Alternative D, the No grazing alternative, does not seem reasonable either given the Congressional directive to continue grazing and the court decision which allows excess forage to be given to livestock.

I don't want to get into the other potentials for alternatives the FWS might have investigated, but this is a defeinite flaw.

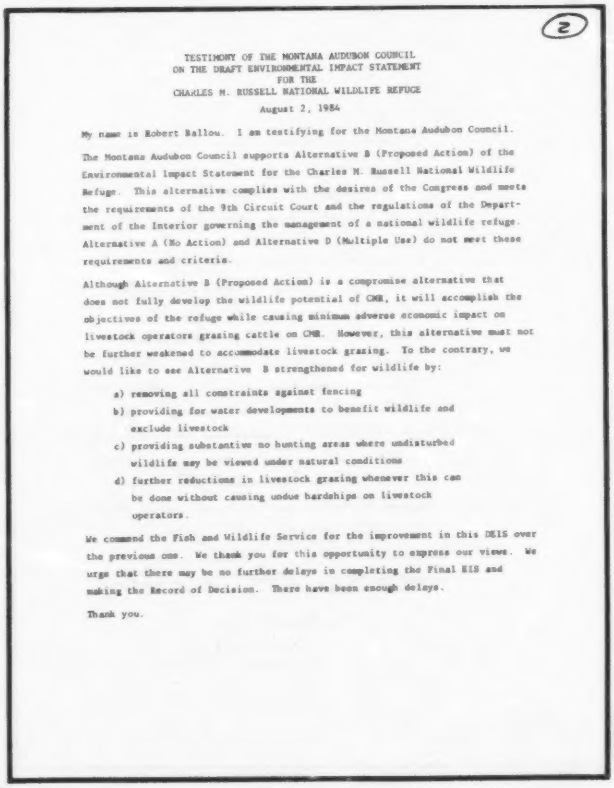
The FWS Proposed Alternative, however, is obviously the best choice offered, and we support it as far as it goes. It must be emphasized, however, that a 33% reduction is a minimum figure for reduction, and is not a compormise point. While we understand the need to phase in grazing redeution to lessen impacts on indicvidual operations, we strongly feel the proposed action represents the smallest acceptable grazing recution.

We also support the FWS plans to reintroduce species like gighorn sheep, peregrine falcons, ferrets and swift foxes. These kinds of positive wildlife efforts are exactly what NWR's were established to do.

We concur that prairie dog control is not appropriate on a ntional wildlife refuge, except in extraordinary cases involved human safety or health.

We agree that coo erative farming and haying should be phased out in the bottoms along the Missouri River and natural river bottoms restored. We believe that will result in a greater diversity and abundance of wildlife.

Thank you for the opportunity to comment. When Congress gave the FWS full management authorty for the refute in 1976, it was with the undertanting that conditions would improve for wildlife. With adoption of the proposed alternative of this DEIS, we can finally start to achieve some of those improvements.



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TESTIMONY OF THE MONTANA AUDUBON COUNCIL
ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE
CHARLES M. RUSSELL NATIONAL WILDLIFE REFUGE

August 2, 1984

My name is Robert Ballou. I am testifying for the Montana Audubon Council.

The Montana Audubon Council supports Alternative B (Proposed Action) of the Environmental Impact Statement for the Charles M. Russell National Wildlife Refuge. This alternative complies with the desires of the Congress and meets the requirements of the 9th Circuit Court and the regulations of the Department of the Interior governing the management of a national wildlife refuge. Alternative A (No Action) and Alternative D (Multiple Use) do not meet these requirements and criteria.

Although Alternative B (Proposed Action) is a compromise alternative that does not fully develop the wildlife potential of CMR, it will accomplish the objectives of the refuge while causing minimum adverse economic impact on livestock operators grazing cattle on CMR. However, this alternative must not be further weakened to accommodate livestock grazing. To the contrary, we would like to see Alternative B strengthened for wildlife by:

a) removing all constraints against fencing
b) providing for water developments to benefit wildlife and exclude livestock
c) providing substantive no hunting areas where undisturbed wildlife may be viewed under natural conditions
d) further reductions in livestock grazing whenever this can be done without causing undue hardships on livestock operators.

We commend the Fish and Wildlife Service for the improvement in this DEIS over the previous one. We thank you for this opportunity to express our views. We urge that there may be no further delays in completing the Final EIS and making the Record of Decision. There have been enough delays.

Thank you.

SPEECH REGARDING CMR GAME RANGE

My name is John A. Langen. I'm Here, speaking to both on my own behalf, and that of my father, Leonard Langen - who couldn't be here this evening.

My grandfather was a sheep rancher in Valley County, and the family has been associated and in the ranching business for nearly three-quarters of a century. I have a cabin at the Pines.

I have been a member of the Fort Peck Forward Steering Committee since its beginnings in 1977. For most of my adult life, I have hunted in and around the CMR.

I have a boat and spend as much time as I can on Fort Peck Lake.

I guess, what I am saying is that my qualifications to give an opinion are pretty much the same as all the other folks that come here from the Glasgow area to testify tonight.

I live, work, play, and raised my family in that area. I consider myself part of the environment.

It's as part of the environment that I would like to appeal to the Fish & Wildlife Service to give the consideration to the people involved, as well as to the animals and the birds living on the CMR.

There is a lot of things about the action proposed by the Fish & Wildlife Service that scare me. I am scared that the cabin sites at the Pines will be closed out. I am afraid that road access and boat launching facilities around

Fort Peck Lake will be curtailed or further reduced, ~~and~~ when they should be developed. But the thing that scares me the most is the recommendation to reduce the grazing.

To me, the livestock rancher is as much a part of the environment and the history of the area, as are the antelope and the deer.

I think the Fish & Wildlife Service should give consideration to these people.

All of Valley County, in fact all of the counties around Fort Peck Lake have an interest in seeing that the livestock rancher on the Charles M. Russell Game Range survives. This range embraces almost the whole south half of Valley County, south of the Milk River, and their mandate now is that they are going to cut the livestock numbers by as much as 1/3.

A cut of that magnitude from any ranchers is simply an order that will drive them out of business for good.

Certainly that's going to have an effect on our tax base, it's going to have an effect on the merchants in Valley County, it's going to have an effect on everybody.

I mentioned that our family has been associated with the ranching business for nearly 75 years. Any one of the ranchers here tonight will tell you that for as long as ranchers have been in Valley County, they have always had to fight economic conditions, low prices, and the weather - particularly the weather.

Right now we are in a terrible battle so far as the livestock industry is concerned in connection with both of these adversaries - namely, the economic conditions and the weather.

I was discussing this year's drouth with my father. He lived through the drouth of the 30's, and in his recollection, this particular year is as severe as any year he can remember back in the 30's. This year, the weather is creating a terrible hardship on the livestock rancher. When you couple this with the hard economic times, it is going to make it almost impossible for many ranchers to survive.

But it seems that these difficulties aren't enough. Now we have a bureaucratic agency, the Fish & Wildlife Service, who comes in as a third adversary. An adversary that recommends cutting grazing by one-third.

It seems to me that this is going too far at this particular time.

The livestock rancher is going to have to cut his numbers anyway because of the poor economic & weather conditions. The additional cut in numbers by the Fish & Wildlife Service adds insult to injury.

I am out on the CMR a lot. As far as the game animals are concerned, it is my feeling that we have more game, more deer, more antelope, and more birds out there now than we have had for years. My father is of the same opinion; and his recollection goes back almost 70 years.

I don't think that the animals out there are suffering one bit. They certainly aren't suffering because of the improved water and range conditions promulgated by the livestock ranchers.

The people in northeast Montana don't need another adversary. Things are tough enough as they are. The people who live in the area aren't against protecting the environment for the benefit of the Fish & Wildlife on CMR. What we are against is the single minded approach of the Fish & Wildlife which promotes this goal to the exclusion of everything else.

Present management practices and the multiple use concept present a more reasonable approach. the action proposed by Fish & Wildlife would be manifestly unfair.

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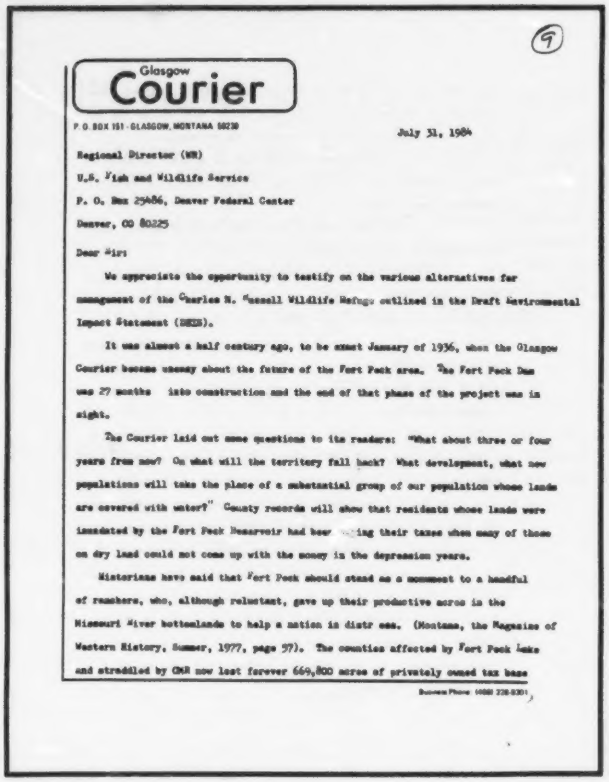

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Glasgow
Courier
P.O. BOX 151 · GLASGOW, MONTANA 59230

July 31, 1984

Regional Director (WR)
U.S. Fish and Wildlife Service
P. O. Box 25486, Denver Federal Center
Denver, CO 80225

Dear Sir:

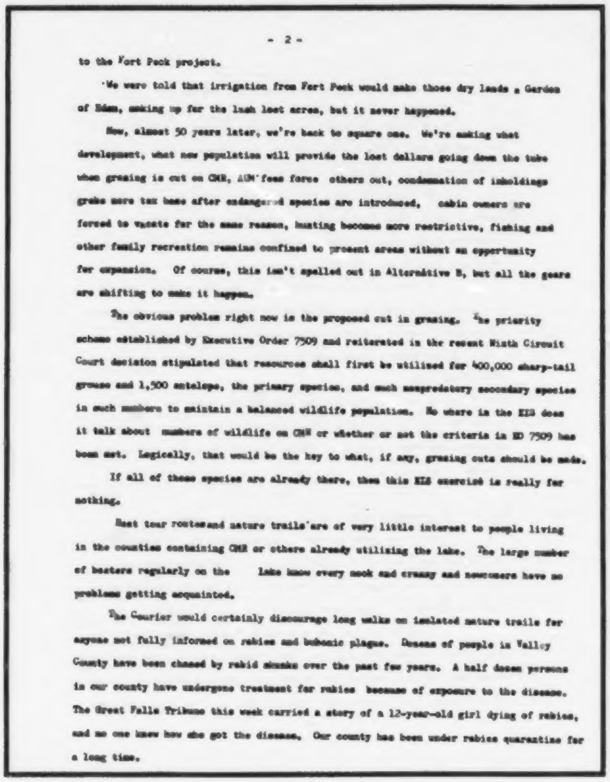
We appreciate the opportunity to testify on the various alternatives for management of the Charles M. Russell Wildlife Refuge outlined in the Draft Environmental Impact Statement (DEIS).

It was almost a half century ago, to be exact January of 1936, when the Glasgow Courier became uneasy about the future of the Fort Peck area. The Fort Peck Dam was 27 months into construction and the end of that phase of the project was in sight.

The Courier laid out some questions to its readers: "What about three or four years from now? On what will the territory fall back? What development, what new populations will take the place of a substantial group of our population whose lands are covered with water?" County records will show that residents whose lands were inundated by the Fort Peck Reservoir had been paying their taxes when many of those on dry land could not come up with the money in the depression years.

Historians have said that Fort Peck should stand as a monument to a handful of ranchers, who, although reluctant, gave up their productive acres in the Missouri River bottomlands to help a nation in distress. (Montana, the Magazine of Western History, Summer, 1977, page 57). The counties affected by Fort Peck Lake and straddled by CMR now lost forever 669,800 acres of privately owned tax base

Business Phone: (406) 228-9301



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to the Fort Peck project.

We were told that irrigation from Fort Peck would make those dry lands a Garden of Eden, making up for the lush lost acres, but it never happened.

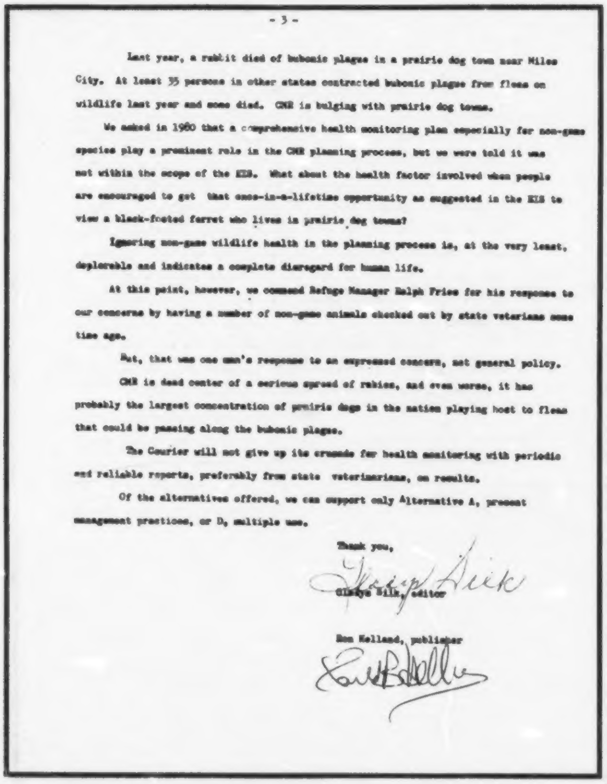
Now, almost 50 years later, we're back to square one. We're asking what development, what new population will provide the lost dollars going down the tube when grazing is cut on CMR, AUM fees force others out, condemnation of inholdings grabs more tax base after endangered species are introduced, cabin owners are forced to vacate for the same reason, hunting becomes more restrictive, fishing and other family recreation remains confined to present areas without an opportunity for expansion. Of course, this isn't spelled out in Alternative B, but all the gears are shifting to make it happen.

The obvious problem right now is the proposed cut in grazing. The priority scheme established by Executive Order 7509 and reiterated in the recent Ninth Circuit Court decision stipulated that resources shall first be utilized for 400,000 sharp-tail grouse and 1,500 antelope, the primary species, and such nonpredatory secondary species in such numbers to maintain a balanced wildlife population. No where in the EIS does it talk about numbers of wildlife on CMR or whether or not the criteria in EO 7509 has been met. Logically, that would be the key to what, if any, grazing cuts should be made.

If all of these species are already there, then this EIS exercise is really for nothing.

Boat tour routes and nature trails are of very little interest to people living in the counties containing CMR or others already utilizing the lake. The large number of boaters regularly on the lake know every nook and cranny and newcomers have no problems getting acquainted.

The Courier would certainly discourage long walks on isolated nature trails for anyone not fully informed on rabies and bubonic plague. Dozens of people in Valley County have been chased by rabid skunks over the past few years. A half dozen persons in our county have undergone treatment for rabies because of exposure to the disease. The Great Falls Tribune this week carried a story of a 12-year-old girl dying of rabies, and no one knew how she got the disease. Our county has been under rabies quarantine for a long time.



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Last year, a rabbit died of bubonic plague in a prairie dog town near Miles City. At least 35 persons in other states contracted bubonic plague from fleas on wildlife last year and some died. CMR is bulging with prairie dog towns.

We asked in 1980 that a comprehensive health monitoring plan especially for non-game species play a prominent role in the CMR planning process, but we were told it was not within the scope of the EIS. What about the health factor involved when people are encouraged to get that once-in-a-lifetime opportunity as suggested in the EIS to view a black-footed ferret who lives in prairie dog towns?

Ignoring non-game wildlife health in the planning process is, at the very least, deplorable and indicates a complete disregard for human life.

At this point, however, we commend Refuge Manager Ralph Fries for his response to our concerns by having a number of non-game animals checked out by state veterians some time ago.

But, that was one man's response to an expressed concern, not general policy.

CMR is dead center of a serious spread of rabies, and even worse, it has probably the largest concentration of prairie dogs in the nation playing host to fleas that could be passing along the bubonic plague.

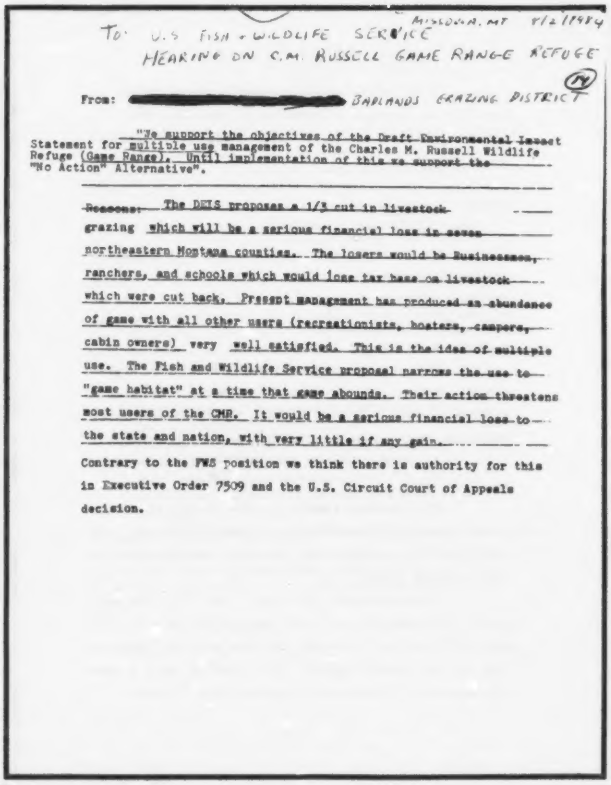
The Courier will not give up its crusade for health monitoring with periodic and reliable reports, preferably from state veterinarians, on results.

Of the alternatives offered, we can support only Alternative A, present management practices, or D, multiple use.

Thank you,

Gladys Wilk, editor

Ron Helland, publisher



MISSOULA, MT 8/2/1984

TO: U.S FISH + WILDLIFE SERVICE
HEARING ON C.M. RUSSELL GAME RANGE REFUGE

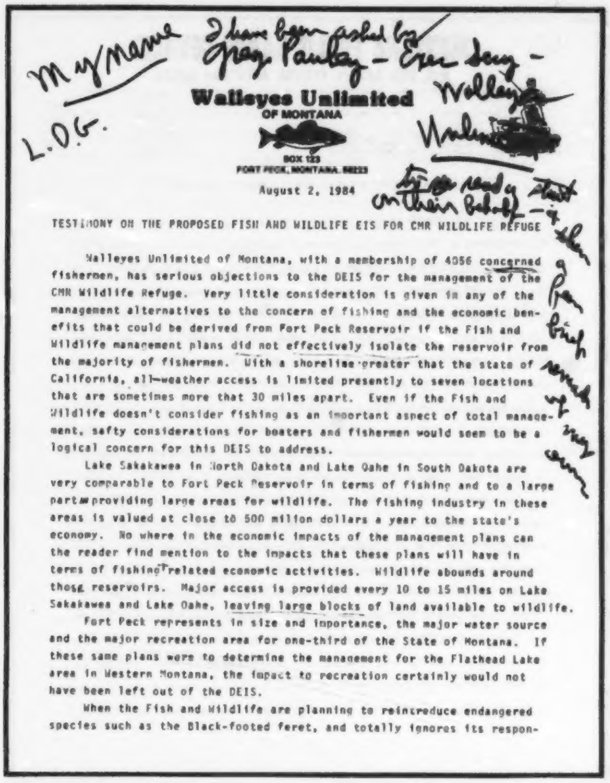
⑭

From: [redacted] BADLANDS GRAZING DISTRICT

"We support the objectives of the Draft Environmental Impact Statement for multiple use management of the Charles M. Russell Wildlife Refuge (Game Range). Until implementation of this we support the "No Action" Alternative".

Reasons: The DEIS proposes a 1/3 cut in livestock grazing which will be a serious financial loss in seven northeastern Montana counties. The losers would be Businessmen, ranchers, and schools which would lose tax base on livestock which were cut back. Present management has produced an abundance of game with all other users (recreationists, boaters, campers, cabin owners) very well satisfied. This is the idea of multiple use. The Fish and Wildlife Service proposal narrows the use to "game habitat" at a time that game abounds. Their action threatens most users of the CMR. It would be a serious financial loss to the state and nation, with very little if any gain.

Contrary to the FWS position we think there is authority for this in Executive Order 7509 and the U.S. Circuit Court of Appeals decision.



My name

L.D.G.

I have been asked by Gary Pauley – Exec Secy – Walley Unlimited to read a stmt on their behalf – & then a few brief remarks of my own

Walleyes Unlimited
OF MONTANA
BOX 123
FORT PECK, MONTANA 59223

August 2, 1984

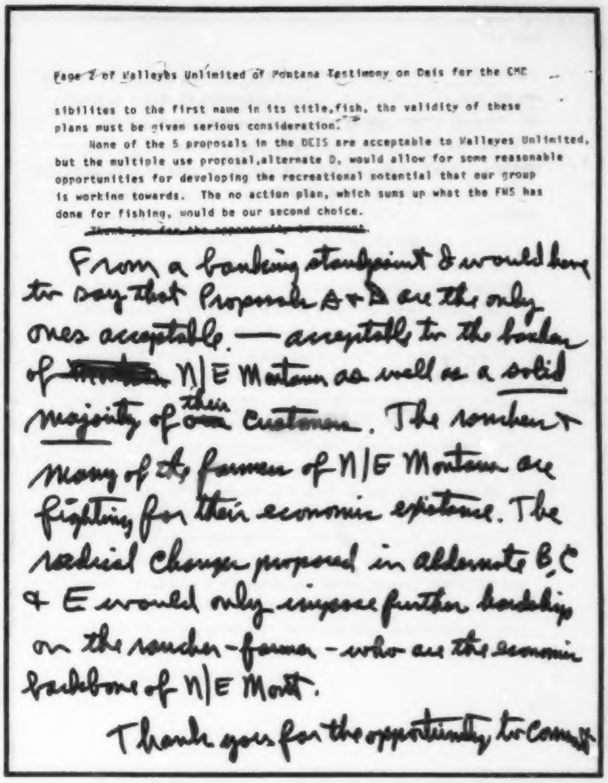
TESTIMONY ON THE PROPOSED FISH AND WILDLIFE EIS FOR CMR WILDLIFE REFUGE

Walleyes Unlimited of Montana, with a membership of 4056 concerned fishermen, has serious objections to the DEIS for the management of the CMR Wildlife Refuge. Very little consideration is given in any of the management alternatives to the concern of fishing and the economic benefits that could be derived from Fort Peck Reservoir if the Fish and Wildlife management plans did not effectively isolate the reservoir from the majority of fishermen. With a shoreline greater that the state of California, all-weather access is limited presently to seven locations that are sometimes more that 30 miles apart. Even if the Fish and Wildlife doesn't consider fishing as an important aspect of total management, safty considerations for boaters and fishermen would seem to be a logical concern for this DEIS to address.

Lake Sakakawea in North Dakota and Lake Oahe in South Dakota are very comparable to Fort Peck Reservoir in terms of fishing and to a large part providing large areas for wildlife. The fishing industry in these areas is valued at close to 500 milion dollars a year to the state's economy. No where in the economic impacts of the management plans can the reader find mention to the impacts that these plans will have in terms of fishing-related economic activities. Wildlife abounds around those reservoirs. Major access is provided every 10 to 15 miles on Lake Sakakawea and Lake Oahe, leaving large blocks of land available to wildlife.

Fort Peck represents in size and importance, the major water source and the major recreation area for one-third of the State of Montana. If these same plans were to determine the management for the Flathead Lake area in Western Montana, the impact to recreation certainly would not have been left out of the DEIS.

When the Fish and Wildlife are planning to reintroduce endangered species such as the Black-footed feret, and totally ignores its responsibilites to the first name in its title, fish, the validity of these plans must be given serious consideration.



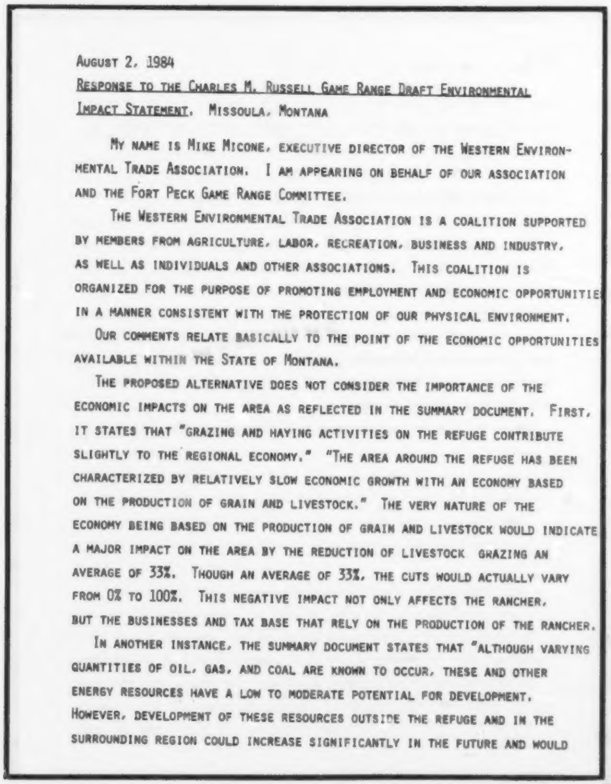
Page 2 of Walleyes Unlimited of Montana Testimony on Deis for the CMR

None of the 5 proposals in the DEIS are acceptable to Walleyes Unlimited, but the multiple use proposal,alternate D, would allow for some reasonable opportunities for developing the recreational potential that our group is working towards. The no action plan, which sums up what the FWS has done for fishing, would be our second choice.

~~Thank you for the opportunity to comment.~~

From a banking standpoint I would have to say that Proposals A & D are the only ones acceptable. — acceptable to the bankers of [illegible] N/E Montana as well as a solid majority of their customers. The ranchers & many of the farmers of N/E Montana are fighting for their economic existence. The radical changes proposed in Alternate B, C & E would only impose further hardships on the rancher-farmer - who are the economic backbone of N/E Mont.

Thank you for the opportunity to comment



AUGUST 2, 1984

RESPONSE TO THE CHARLES M. RUSSELL GAME RANGE DRAFT ENVIRONMENTAL IMPACT STATEMENT, MISSOULA, MONTANA

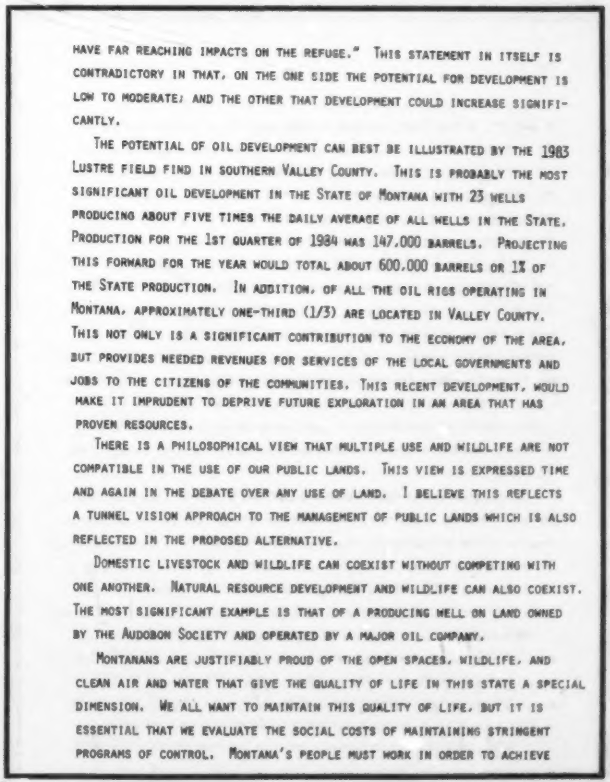
MY NAME IS MIKE MICONE, EXECUTIVE DIRECTOR OF THE WESTERN ENVIRONMENTAL TRADE ASSOCIATION. I AM APPEARING ON BEHALF OF OUR ASSOCIATION AND THE FORT PECK GAME RANGE COMMITTEE.

THE WESTERN ENVIRONMENTAL TRADE ASSOCIATION IS A COALITION SUPPORTED BY MEMBERS FROM AGRICULTURE, LABOR, RECREATION, BUSINESS AND INDUSTRY, AS WELL AS INDIVIDUALS AND OTHER ASSOCIATIONS. THIS COALITION IS ORGANIZED FOR THE PURPOSE OF PROMOTING EMPLOYMENT AND ECONOMIC OPPORTUNITIES IN A MANNER CONSISTENT WITH THE PROTECTION OF OUR PHYSICAL ENVIRONMENT.

OUR COMMENTS RELATE BASICALLY TO THE POINT OF THE ECONOMIC OPPORTUNITIES AVAILABLE WITHIN THE STATE OF MONTANA.

THE PROPOSED ALTERNATIVE DOES NOT CONSIDER THE IMPORTANCE OF THE ECONOMIC IMPACTS ON THE AREA AS REFLECTED IN THE SUMMARY DOCUMENT. FIRST, IT STATES THAT "GRAZING AND HAYING ACTIVITIES ON THE REFUGE CONTRIBUTE SLIGHTLY TO THE REGIONAL ECONOMY." "THE AREA AROUND THE REFUGE HAS BEEN CHARACTERIZED BY RELATIVELY SLOW ECONOMIC GROWTH WITH AN ECONOMY BASED ON THE PRODUCTION OF GRAIN AND LIVESTOCK." THE VERY NATURE OF THE ECONOMY BEING BASED ON THE PRODUCTION OF GRAIN AND LIVESTOCK WOULD INDICATE A MAJOR IMPACT ON THE AREA BY THE REDUCTION OF LIVESTOCK GRAZING AN AVERAGE OF 33%. THOUGH AN AVERAGE OF 33%, THE CUTS WOULD ACTUALLY VARY FROM 0% TO 100%. THIS NEGATIVE IMPACT NOT ONLY AFFECTS THE RANCHER, BUT THE BUSINESSES AND TAX BASE THAT RELY ON THE PRODUCTION OF THE RANCHER.

IN ANOTHER INSTANCE, THE SUMMARY DOCUMENT STATES THAT "ALTHOUGH VARYING QUANTITIES OF OIL, GAS, AND COAL ARE KNOWN TO OCCUR, THESE AND OTHER ENERGY RESOURCES HAVE A LOW TO MODERATE POTENTIAL FOR DEVELOPMENT. HOWEVER, DEVELOPMENT OF THESE RESOURCES OUTSIDE THE REFUGE AND IN THE SURROUNDING REGION COULD INCREASE SIGNIFICANTLY IN THE FUTURE AND WOULD HAVE FAR REACHING IMPACTS ON THE REFUGE." THIS STATEMENT IN ITSELF IS CONTRADICTORY IN THAT, ON THE ONE SIDE THE POTENTIAL FOR DEVELOPMENT IS LOW TO MODERATE; AND THE OTHER THAT DEVELOPMENT COULD INCREASE SIGNIFICANTLY.

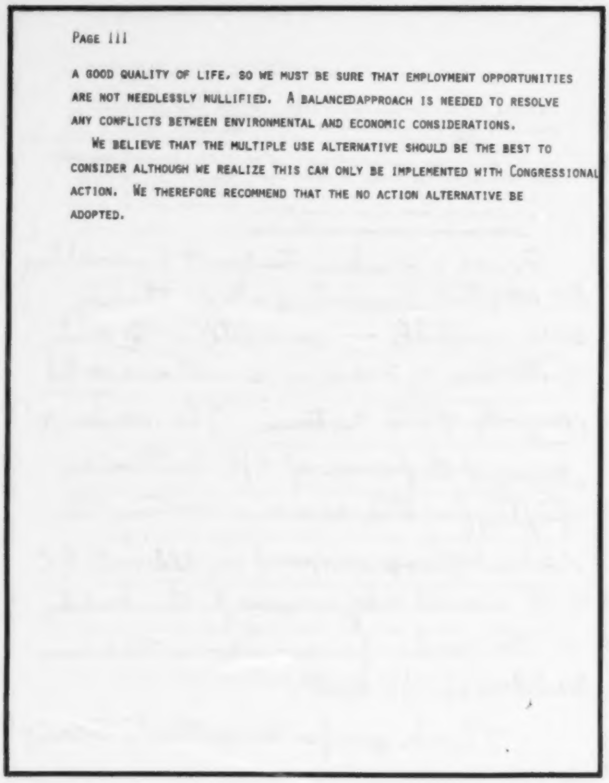


THE POTENTIAL OF OIL DEVELOPMENT CAN BEST BE ILLUSTRATED BY THE 1983 LUSTRE FIELD FIND IN SOUTHERN VALLEY COUNTY. THIS IS PROBABLY THE MOST SIGNIFICANT OIL DEVELOPMENT IN THE STATE OF MONTANA WITH 23 WELLS PRODUCING ABOUT FIVE TIMES THE DAILY AVERAGE OF ALL WELLS IN THE STATE. PRODUCTION FOR THE 1ST QUARTER OF 1984 WAS 147,000 BARRELS. PROJECTING THIS FORWARD FOR THE YEAR WOULD TOTAL ABOUT 600,000 BARRELS OR 1% OF THE STATE PRODUCTION. IN ADDITION, OF ALL THE OIL RIGS OPERATING IN MONTANA, APPROXIMATELY ONE-THIRD (1/3) ARE LOCATED IN VALLEY COUNTY. THIS NOT ONLY IS A SIGNIFICANT CONTRIBUTION TO THE ECONOMY OF THE AREA, BUT PROVIDES NEEDED REVENUES FOR SERVICES OF THE LOCAL GOVERNMENTS AND JOBS TO THE CITIZENS OF THE COMMUNITIES. THIS RECENT DEVELOPMENT, WOULD MAKE IT IMPRUDENT TO DEPRIVE FUTURE EXPLORATION IN AN AREA THAT HAS PROVEN RESOURCES.

THERE IS A PHILOSOPHICAL VIEW THAT MULTIPLE USE AND WILDLIFE ARE NOT COMPATIBLE IN THE USE OF OUR PUBLIC LANDS. THIS VIEW IS EXPRESSED TIME AND AGAIN IN THE DEBATE OVER ANY USE OF LAND. I BELIEVE THIS REFLECTS A TUNNEL VISION APPROACH TO THE MANAGEMENT OF PUBLIC LANDS WHICH IS ALSO REFLECTED IN THE PROPOSED ALTERNATIVE.

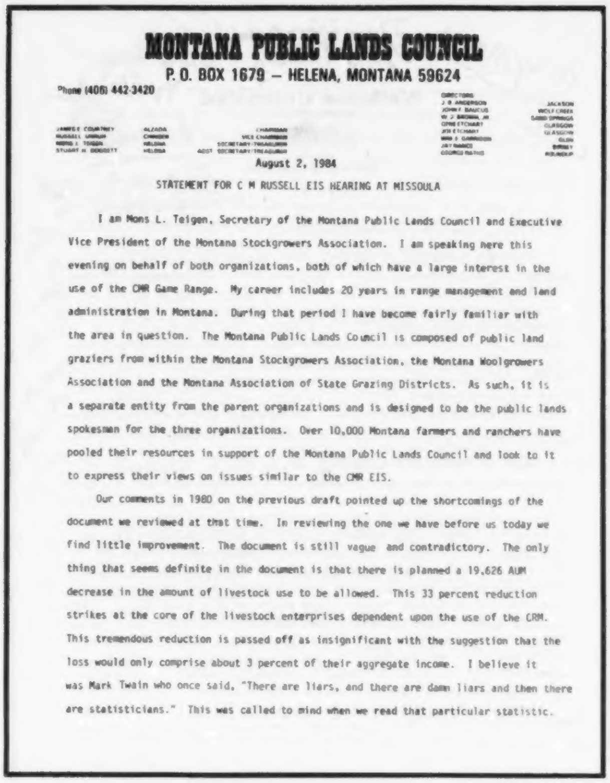
DOMESTIC LIVESTOCK AND WILDLIFE CAN COEXIST WITHOUT COMPETING WITH ONE ANOTHER. NATURAL RESOURCE DEVELOPMENT AND WILDLIFE CAN ALSO COEXIST. THE MOST SIGNIFICANT EXAMPLE IS THAT OF A PRODUCING WELL ON LAND OWNED BY THE AUDOBON SOCIETY AND OPERATED BY A MAJOR OIL COMPANY.

MONTANANS ARE JUSTIFIABLY PROUD OF THE OPEN SPACES, WILDLIFE, AND CLEAN AIR AND WATER THAT GIVE THE QUALITY OF LIFE IN THIS STATE A SPECIAL DIMENSION. WE ALL WANT TO MAINTAIN THIS QUALITY OF LIFE, BUT IT IS ESSENTIAL THAT WE EVALUATE THE SOCIAL COSTS OF MAINTAINING STRINGENT PROGRAMS OF CONTROL. MONTANA'S PEOPLE MUST WORK IN ORDER TO ACHIEVE



A GOOD QUALITY OF LIFE, SO WE MUST BE SURE THAT EMPLOYMENT OPPORTUNITIES ARE NOT NEEDLESSLY NULLIFIED. A BALANCEDAPPROACH IS NEEDED TO RESOLVE ANY CONFLICTS BETWEEN ENVIRONMENTAL AND ECONOMIC CONSIDERATIONS.

WE BELIEVE THAT THE MULTIPLE USE ALTERNATIVE SHOULD BE THE BEST TO CONSIDER ALTHOUGH WE REALIZE THIS CAN ONLY BE IMPLEMENTED WITH CONGRESSIONAL ACTION. WE THEREFORE RECOMMEND THAT THE NO ACTION ALTERNATIVE BE ADOPTED.



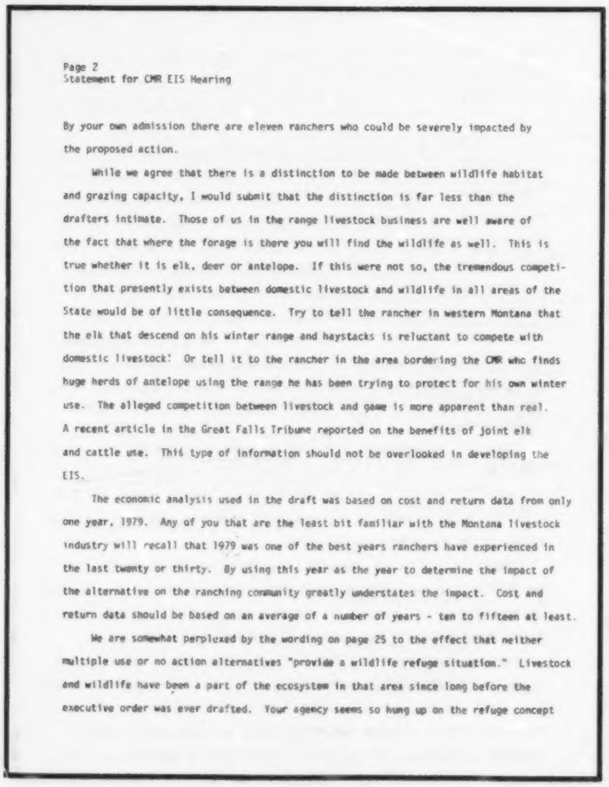
MONTANA PUBLIC LANDS COUNCIL
P. O. BOX 1679 — HELENA, MONTANA 59624
Phone (406) 442-3420

August 2, 1984

STATEMENT FOR C M RUSSELL EIS HEARING AT MISSOULA

I am Mons L. Teigen, Secretary of the Montana Public Lands Council and Executive Vice President of the Montana Stockgrowers Association. I am speaking here this evening on behalf of both organizations, both of which have a large interest in the use of the CMR Game Range. My career includes 20 years in range management and land administration in Montana. During that period I have become fairly familiar with the area in question. The Montana Public Lands Council is composed of public land graziers from within the Montana Stockgrowers Association, the Montana Woolgrowers Association and the Montana Association of State Grazing Districts. As such, it is a separate entity from the parent organizations and is designed to be the public lands spokesman for the three organizations. Over 10,000 Montana farmers and ranchers have pooled their resources in support of the Montana Public Lands Council and look to it to express their views on issues similar to the CMR EIS.

Our comments in 1980 on the previous draft pointed up the shortcomings of the document we reviewed at that time. In reviewing the one we have before us today we find little improvement. The document is still vague and contradictory. The only thing that seems definite in the document is that there is planned a 19,626 AUM decrease in the amount of livestock use to be allowed. This 33 percent reduction strikes at the core of the livestock enterprises dependent upon the use of the CRM. This tremendous reduction is passed off as insignificant with the suggestion that the loss would only comprise about 3 percent of their aggregate income. I believe it was Mark Twain who once said, "There are liars, and there are damn liars and then there are statisticians." This was called to mind when we read that particular statistic.

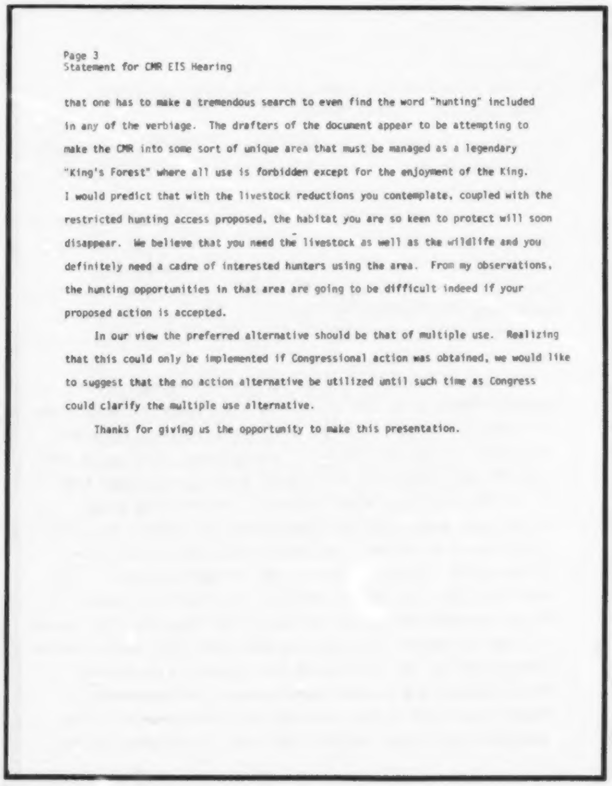


By your own admission there are eleven ranchers who could be severely impacted by the proposed action.

While we agree that there is a distinction to be made between wildlife habitat and grazing capacity, I would submit that the distinction is far less than the drafters intimate. Those of us in the range livestock business are well aware of the fact that where the forage is there you will find the wildlife as well. This is true whether it is elk, deer or antelope. If this were not so, the tremendous competition that presently exists between domestic livestock and wildlife in all areas of the State would be of little consequence. Try to tell the rancher in western Montana that the elk that descend on his winter range and haystacks is reluctant to compete with domestic livestock! Or tell it to the rancher in the area bordering the CMR who finds huge herds of antelope using the range he has been trying to protect for his own winter use. The alleged competition between livestock and game is more apparent than real. A recent article in the Great Falls Tribune reported on the benefits of joint elk and cattle use. This type of information should not be overlooked in developing the EIS.

The economic analysis used in the draft was based on cost and return data from only one year, 1979. Any of you that are the least bit familiar with the Montana livestock industry will recall that 1979 was one of the best years ranchers have experienced in the last twenty or thirty. By using this year as the year to determine the impact of the alternative on the ranching community greatly understates the impact. Cost and return data should be based on an average of a number of years - ten to fifteen at least.

We are somewhat perplexed by the wording on page 25 to the effect that neither multiple use or no action alternatives "provide a wildlife refuge situation." Livestock and wildlife have been a part of the ecosystem in that area since long before the executive order was ever drafted. Your agency seems so hung up on the refuge concept



that one has to make a tremendous search to even find the word "hunting" included in any of the verbiage. The drafters of the document appear to be attempting to make the CMR into some sort of unique area that must be managed as a legendary "King's Forest" where all use is forbidden except for the enjoyment of the King. I would predict that with the livestock reductions you contemplate, coupled with the restricted hunting access proposed, the habitat you are so keen to protect will soon disappear. We believe that you need the livestock as well as the wildlife and you definitely need a cadre of interested hunters using the area. From my observations, the hunting opportunities in that area are going to be difficult indeed if your proposed action is accepted.

In our view the preferred alternative should be that of multiple use. Realizing that this could only be implemented if Congressional action was obtained, we would like to suggest that the no action alternative be utilized until such time as Congress could clarify the multiple use alternative.

Thanks for giving us the opportunity to make this presentation.

10

Good Evening, I am Marlyn Orahood from Malta, Montana which is in the county of Phillips. Phillips and Valley County border the Charles M. Russell National Wildlife Refuge. My husband, Wesley and I belong to the Wittmayer Grazing Association which has a grazing allotment on the CMR. I am representing the Malta City Council and the Malta Area Chamber of Commerce. The towns and counties derive alot of economic stability from the livestock production within the counties.

How many people who are testifying here tonight, for or against the proposed alternative that the Fish and Wildlife Service are suggesting, are well informed about the C.M.Russell Wildlife Refuge and how important the grazing allotment is to our area? Have you visited the CMR extensively enough to say you know anything about it? Or have you been involved in the actual use of it, to the point that part of your well being relies on the CMR, such as using it for recreation, like a cabin on its lakeshore, or boating on the lake, camping and hunting in the rougher areas or using it to graze your livestock.

The livestock industry supports in a chain reaction all of the other means that people have of making a living in our counties. That livestock that grazes on CMR or is owned by the producer must pay our Taxes, and for our food, machinery, clothes, our newspaper and any other commodity that people invest their money in to make a life for themselves. The tinker, tailor, cowboy, sailor, doctor, lawyer, merchant, and theif are paid so they can spend money to support other people.

LIvestock men are naturalists, conservationists and they protect the envirnment. If these producers were not aware and using good farming and ranching practices, land would have been well used up by now, with production greatly reduced. The livestock operators on or near the CMR Refuge have contributed part of themselves and their livelyhood to the success of the wildlife management on the CMR.

The farmers and ranchers that rely on the CMR to graze their livestock know that the Fish and Wildlife Service have presented a confusing, inconsistant, inaccurate and biased opinion in this informational DEIS for the general public to form opinions that reflect comprehensive thinking. For more information about this misrepresentation of so called facts please refer to the written testimony that Chuck Hitch gave on page 250 and the testimony that Robert M.Hyde Ph.D gave on page 302 of the 1984 DEIS. When the DEIS was written there were many inconsistancies in the presentation. What was good or allowable for one alternative was not valued in the next alternative.

The Federal Government is working against itself. The FHA set up the Wittmayer Grazing Associations financing. The Association was set up for ranchers who had ample hay base but not enough grazing. This association was financed in such a fashion, so the rancher could make a living as well as buy grazing rights for his livestock.Part of this association is on the CMR. The Fish and Wildlife,in direst contradiction.of the FHA, is attempting to cut grazing rights, making it impossible to pay for this after paying into the association for 14 years.

This whole process of eliminating the grazing rights has been a study in mismanagement and waste on the part of the Federal Government.and the Fish and Wildlife Service. This waste is paid for by all of us, the taxpayers of Montana.We have and are paying for wasted time, wasted money and wasted manpower.

This DEIS has been confusing because the range specialists say that the range is 92% in excellent to good condition. Then the FWS turns around and says that the livestock AUM's have to be cut. The EIS doesn't brag and say that they know how many wildlife animals are on the refuge. Nor do they tell us how many birds live on the refuge. The original Excutive order 7509 called for 400,000 sharp tailed grouse and 1500 antelope and such non preditory species that will maintain a balanced wildlife population. It also allowed for the grazing of livestock. Perhaps, because of mismanagement the Fish and Wildlife Services isn't aware of just how much wildlife has overflowed on to the farmers and ranchers deeded land. This DEIS has included the privately owned land that is within the CMR. This includes State land, school sections and land owned by private citizens. This deeded land is used for cattle grazing. Will these private citizens have to carry the wildlife as well as there own cattle and not be able to use CMR for part of their grazing allotment?

Do you know why we have hearings about CMR in Missoula? This hearing is here because the Fish and Wildlife Service needs input from people who have been presented a very biased report, but not an honest, factual statement about the conditions on CMR. Citizens you have been misled by a Federal Government bureau called Fish an Wildlife Service, They are trying to make work for themselves so they can keep their soft cushioney jobs.

Ask the Fish and Wildlife how many antelope, deer, and elk are on the Refuge. Then ask them how many antelope, deer and elk the farmers and ranchers are feeding because these species won't eat old grass, this wildlife wantnew green grass. Because CMR is in excellent condition with lots of old grass the wildlife has come out to the grain fields, meadow hay, alfalfa and alfalfa seed fields to get green feed. If livestock who will eat old grass are kept on the CMR the old grass will get used and the antelope deer and elk will stay on the new green grass that is growing.

The Fish and Wildlife Service has promoted and actually wasted natural resources on CMR. They are planning burns to get rid of the old grass in Garfield County. The livestock, cattle and sheep will eat this old grass if they are given a chance in this management scheme.

The Fish and Wildlife have allowed the prarie dog towns to get out of hand. The reasoning for having prairie dog towns is to transplant black footed ferrets to these towns in the hope they will feed upon the prairie dogs and then reproduce rather rapidly and then be removed from the endangered specie list. But..... black footed ferrets are preditors and the Excutive Order7509 explicitly said non preditory.

Now envision a prairie dog town on the outer fringes of CMR--like on Holly Flat or over near Burkes, who have their headquarters on private land with in the Refuge. Prairie dog towns grow by leaps and bounds.In 1974 there were 53 prairie dog towns on the CMR and in 1980 their were 112 towns on CMR. As the dogs use up the feed so neither they nor any other animal has anything to eat, so they move out onto the farmers and ranchers private land. What will the Fish and Wildlife Service do then? Condem the private land, like in Communism, so that a preditor will have room to multiply. Think about this, The Holly Flat, I mentioned, at one time produced enough hay to feed over 600 head of cows in the winter. Now it is all just one huge prairie-dog town. There is no wild hay left for anything to graze upon. Nearly 8% of overgrazed land on CMR is prarie dog towns

I would like to let it be know that I prefer Alternative A of all the alternatives that have been put forward in the Charles M. Russell National Wildlife Refuge Draft Environmental Impact Statement.